

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IRIS WEINSTEIN HAGGAI, on her own behalf  
and on behalf of JUDY LYNNE WEINSTEIN and  
GAD HAGGAI, JOHN DOE, RICHARD ROE,  
JANE MOE, SHLOMI ZIV, AYELET  
SAMERANO, on her own behalf and on behalf of  
YONATAN SAMERANO, TALIK GVILI, on her  
own behalf and on behalf of RAN GVILI, ROEE  
BARUCH, on his own behalf and on behalf of  
URIEL BARUCH, and JAMES POE, on his own  
behalf and on behalf of LEO POE,

Plaintiffs,

- against -

NERDEEN KISWANI, individually and as the  
representative of WITHIN OUR LIFETIME-  
UNITED FOR PALESTINE, MARYAM ALWAN,  
individually and as the representative of  
COLUMBIA STUDENTS FOR JUSTICE IN  
PALESTINE, CAMERON JONES, individually  
and as the representative of COLUMBIA-  
BARNARD JEWISH VOICE FOR PEACE, and  
MAHMOUD KHALIL, individually and as the  
representative of COLUMBIA UNIVERSITY  
APARTHEID DIVEST, COLUMBIA  
STUDENTS FOR JUSTICE IN PALESTINE, and  
COLUMBIA-BARNARD JEWISH VOICE FOR  
PEACE,

Defendants.

Case No.:

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiffs Iris Weinstein Haggai, on her own behalf and on behalf of Judy Lynne Weinstein and Gad Haggai, John Doe, Richard Roe, Jane Moe, Shlomi Ziv, Ayelet Samerano, on her own behalf and on behalf of Yonatan Samerano, Talik Gvili, on her own behalf and on behalf of Ran Gvili, Roee Baruch, on his own behalf and on behalf of Uriel Baruch, and James Poe, on his own

behalf and on behalf of Leo Poe, by and through the undersigned counsel, respectfully submit this Complaint pursuant to the Antiterrorism Act (“ATA”), 18 U.S.C. § 2333(d), and the Alien Tort Statute (“ATS”), 28 U.S.C. § 1350, to hold Associational Defendants (defined below), through their representatives, accountable for aiding and abetting Hamas’ continuing acts of international terrorism and violations of the law of nations.<sup>1</sup>

## **INTRODUCTION**

1. Defendants in this case are Hamas’ propaganda arm in New York City and on the Columbia University campus. We know this because they advertise themselves as such. Their self-described acts in furtherance of their goals to assist Hamas have included terrorizing and assaulting Jewish students, unlawfully taking over and damaging public and university property on Columbia’s campus, and physically assaulting Columbia University employees. They act behind veiled scarves and largely seek to be anonymous individually, yet seek to intimidate as a group. This case will pull down those scarves and unveil acts that violate this country’s antiterrorism laws. This case will finally hold these admitted terrorists accountable for their actions. It is time for American campuses to return to being centers for learning and to be saved from the relentless occupation by Hamas’ tragically misguided cohorts.

2. Plaintiffs are victims of Hamas’ heinous and ongoing acts of international terrorism that began on October 7, 2023, the deadliest day for the Jewish people since the Holocaust, and that have continued unabated until today. This action seeks to hold responsible those who operate critical allies of Hamas in the United States: New York-based organizations and individuals who, in coordination with Hamas and its affiliates, further Hamas’ continuing terror attacks and actions

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<sup>1</sup> Contemporaneously with this Complaint, Plaintiffs are filing a motion for an order permitting John Doe, Richard Roe, Jane Moe, James Poe, and Leo Poe to proceed pseudonymously. As detailed in the motion, pseudonymity is warranted to protect these individuals from grave physical danger and well-founded fears of antisemitic harassment, retaliation, and reputational harms.

with insidious, pro-terror public relations operations, propaganda production and distribution, and unlawful acts.

3. Hamas is a terrorist organization founded in 1987 with the express goal of destroying the State of Israel and murdering all Jews. Today, Hamas has expanded its targets to include the United States and Western values. Hamas furthers its objectives with suicide bombings, rocket attacks, stabbings, kidnapping, and using civilians as human shields. Beyond shedding the blood of the innocent, Hamas also uses vast, well-organized, and well-funded international propaganda networks to destroy Israel's public image to both disrupt Israel's relationships in the West and prevent it from developing new relationships, especially with its Arab neighbors.

4. Hamas' strategy is to commit acts of international terrorism against civilians and then use Israel's retaliatory or defensive response as a springboard to allow its propaganda affiliates throughout the world perpetuate objectively false propaganda and terrorize institutions to sway public opinion against Israel and toward Hamas. Hamas's propaganda campaigns regularly include, among other things, misrepresentative death tolls and false accusations that Israel is a genocidal "apartheid state."<sup>2</sup> This terror-by-propaganda strategy "transcends conventional warfare tactics, aiming to exploit the international community's response to civilian casualties, generate global condemnation of Israel, hamstring the [Israeli military's] operations, and protect Hamas's military capabilities under the guise of civilian safety."<sup>3</sup>

5. For decades, Hamas has maintained what is a functionally a U.S.-based in-house public relations firm, which has changed forms several times to evade criminal and civil liability.

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<sup>2</sup> It is widely known, for example, that approximately 2 million Muslims live in Israel, and nearly all are citizens or permanent residents. See, e.g., Kali Robinson, *What to Know About the Arab Citizens of Israel*, COUNCIL ON FOREIGN RELATIONS (Oct. 26, 2023), <https://www.cfr.org/backgrounder/what-know-about-arab-citizens-israel>.

<sup>3</sup> Joshua Klein, *Exclusive: Renown Urban Warfare Expert John Spencer Warns 'World Playing Into Hamas's Strategy'*, BREITBART (Apr. 1, 2024), <https://www.breitbart.com/politics/2024/04/01/exclusive-renown-urban-warfare-expert-john-spencer-warns-world-playing-hamass-strategy/>.

Today, Hamas' American propaganda arm is directed and controlled by AJP Educational Foundation, Inc. a/k/a American Muslims for Palestine ("AMP") and its on-campus brand, National Students for Justice in Palestine ("NSJP") (collectively, "AMP/NSJP").

6. The Defendants are Within Our Lifetime – United for Palestine ("Within Our Lifetime"), Columbia Students for Justice in Palestine ("Columbia SJP"), Columbia-Barnard Jewish Voice for Peace ("Columbia JVP"), and Columbia University Apartheid Divest ("CUAD") (collectively "Associational Defendants") and their respective leaders Nerdeen Kiswani, Maryam Alwan, Cameron Jones, and Mahmoud Khalil. The Associational Defendants, which are sued through these leaders, form the New York City branches of Hamas' American propaganda firm. They are among AMP/NSJP's most important partners and affiliates.

7. On October 7, 2023, Hamas led a terrorist attack on Southern Israel. Hamas murdered more than 1,200 innocent people, including American citizens, and took more than 200 hostages back to Gaza. Since October 7, Hamas has continued to engage in countless acts of international terrorism, including continuing to hold hostage innocent civilians abducted on October 7, stealing and refusing to return the bodies of those they murdered, firing rockets at innocent civilians in Israel, and attacking Israeli soldiers.

8. While the attack was still underway, Hamas initiated its call for the "resistance abroad" to "join the battle in any way they can." The Associational Defendants resoundingly and knowingly answered Hamas' call to action.

9. On October 8, 2023, AMP/NSJP distributed a manifesto ("NSJP Toolkit") that included materials that appear to have been created before October 7. The NSJP Toolkit: (i) identifies AMP/NSJP as "PART of" a "Unity Intifada" governed by Hamas' "unified command" of terrorist operations in Gaza; (ii) calls on AMP/NSJP's partners and allies to organize a "Day of



Resistance” using specified graphics and marketing materials; and (iii) directed its allies to sign what was, effectively, a loyalty pledge to Hamas. On information and belief, AMP/NSJP sent the NSJP Toolkit to the Associational Defendants, which acted on the AMP/NSJP’s directions.

10. Associational Defendants followed the NSJP Toolkit to the letter. Since October 7, these organizations have only been more aggressive and more militant in their efforts to, in coordination with Hamas and AMP/NSJP, distribute Hamas-created and affiliated propaganda, incite fear and violence, and attack critical academic, economic, and infrastructure centers in New York City.

11. Associational Defendants have distributed pro-terror propaganda produced by and literally stamped with the logo of the “Hamas Media Office.” They also secretly and directly coordinated with Hamas’ terror patron, the Islamic Revolutionary Guard Corps (“IRGC”), to institute a blockade of critical infrastructure and institutions in New York City to support Hamas. They have also repeatedly terrorized and assaulted Jews across New York City and on Columbia University’s campus, physically assaulted Columbia University employees, and illegally seized and damaged public and private property.

12. There is a legal chasm between independent political advocacy and coordinating with a foreign terrorist organization to seed pro-terror propaganda throughout America’s largest city. Associational Defendants are not independent advocates; they are expert propagandists and recruiters for international foreign terrorist organizations and nation-state proxies operating in plain sight in New York City. Their actions violate the Antiterrorism Act and the law of nations.

### **THE PLAINTIFFS**

13. Plaintiff Iris Weinstein Haggai, a U.S. citizen, is the daughter of Judy Lynne Weinstein, a U.S. citizen and Gad Haggai, a U.S. citizen. On October 7, 2023, Hamas terrorists

invaded their home in Kibbutz Nir Oz, a kibbutz in southern Israel. Iris's friends were murdered, their children were burnt alive, and her community was destroyed. At 6:50 am, Iris' mother called her terrified from the field where she and Iris' father were hiding from the terrorists. Iris's parents disappeared. For 83 agonizing days, she had no idea if her parents were alive and being tortured, or dead. The psychological terror of not knowing was unbearable. Finally, Iris and her family received unconfirmed intelligence that Hamas terrorists had likely brutally murdered her parents and stolen their bodies to use as bargaining chips. To this day, their bodies remain stolen in Hamas captivity, and Iris is still clinging to the hope that they might still be alive, as Hamas sometimes pretends that they have killed living hostages as part of their psychological torture. In fact, in approximately May 2024, Hamas released information suggesting that Iris' mother may have been alive when taken to Gaza as a hostage. Hamas implied she died in an Israeli airstrike.<sup>4</sup> As a result of Hamas' unspeakable acts, Iris has suffered, and continues to suffer, severe mental and emotional pain, suffering, and distress. She brings a claim on her own behalf and on behalf of her parents under the Antiterrorism Act against Associational Defendants for aiding and abetting the kidnapping and murder of her parents, and the kidnapping of her parents' bodies, a continuing act of international terrorism that persists through this day.

14. Plaintiff John Doe is a United States citizen and reservist in the Israel Defense Forces ("IDF"). In 2014, John Doe sustained injuries fighting Hamas in Operation Protective Edge. On October 7, 2023, Doe was pursuing a law degree from Columbia Law School. But following Hamas' terrorist attack, he was called up for reserve duty. Doe spent 100 consecutive days in and around Gaza fighting Hamas. During that time, he was involved in gunfights and attacks by Hamas terrorists, each an act of international terrorism and collectively an ongoing act of international

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<sup>4</sup> *Hamas Claims Israeli Hostage Killed in IDF Strike in New Propaganda Video*, JERUSALEM POST (May 7, 2024), <https://www.jpost.com/breaking-news/article-800313>.

terrorism. While fighting Hamas, Doe suffered mental anguish and pain and suffering. He continues to suffer from the effects of his service and continues to suffer ongoing mental and emotional trauma. Now that he has returned home, he is still forced to confront Hamas affiliates on his own campus. Doe brings a claim under the Antiterrorism Act against Associational Defendants for aiding and abetting Hamas' acts of international terrorism.

15. Plaintiff Richard Roe is a United States citizen and a reservist in the IDF. On October 7, 2023, upon learning of the attacks against Israel, his family, and his friends, he immediately returned to serve. He was deployed to the Gaza Envelope, operating in Kfar Aza, Be'eri, and Nahal Oz, and he later participated in operations in Khan Yunis to dismantle Hamas leadership and infrastructure. After months of service, Roe returned to the United States to complete his studies at Columbia University, where he was met with an overwhelming atmosphere of hostility and discrimination created by Associational Defendants. In one instance, a classmate approached Roe, openly declared their support for Hamas as a "freedom fighter" group, and told Roe that his family and friends live on stolen land. In another, a student accosted Roe as he was standing at a pro-Israel table at the campus clubs fair, put pro-Hamas stickers on their materials, pushed the table, and ripped up the sign-up papers. At Associational Defendants' urging, students actively distance themselves from Roe and other Jewish students, refuse to work with him, ignore him, and treat him as a second-class citizen. Students and professors alike have confided to Roe that they do not feel safe at school in light of the severe antisemitic disruption alleged herein. Roe has felt constantly threatened and forced to defend himself, both physically and verbally. Roe brings a claim under the Antiterrorism Act against Associational Defendants for aiding and abetting Hamas' acts of international terrorism.

16. Plaintiff Jane Moe, a U.S. citizen, served in the IDF before enrolling at Columbia University. On October 7, Moe's younger brother was deployed to Gaza, where he fought against Hamas for over a year and sustained injuries in battle. While on Columbia's campus, Moe has experienced severe emotional distress and fear due to pro-Hamas protests occurring just outside her window. These demonstrations glorify the very terrorists who had attempted to harm and kill her brother, exacerbating her emotional turmoil. Moe brings a claim under the Antiterrorism Act against Associational Defendants for aiding and abetting Hamas' acts of international terrorism.

17. Plaintiff Shlomi Ziv, an Israeli citizen, was a member of the security team at the Nova Music Festival in southern Israel on October 7. During the attack, Shlomi remained at the festival site to fend off terrorists and evacuate people, until he himself was kidnapped and taken to Gaza. Shlomi was held hostage in Gaza for 246 days, in the home of a Hamas operative, until he was rescued by the IDF. While held hostage, Shlomi's Hamas captors bragged about having Hamas operatives on American university campuses. In fact, they showed him Al-Jazeera stories and photographs of protests at Columbia University that were organized by Associational Defendants while he was being held hostage. Shlomi suffered, and continues to suffer, mental anguish and pain and suffering because of his kidnapping. Shlomi brings a claim under the Alien Tort Statute against Associational Defendants for aiding and abetting his kidnapping by Hamas in violation of the law of nations.

18. Plaintiff Ayelet Samerano, an Israeli citizen, is a mother whose life was irreversibly shattered by the atrocities of October 7. Ayelet's 21-year-old son, Yonatan Samerano, was shot and killed by a terrorist during the Hamas-led onslaught. Then, Yonatan's body was captured, tossed into the back of a vehicle, and driven to Gaza. Hamas and its allies continue to hold Yonatan's body captive today. Ayelet has suffered, and continues to suffer, mental anguish and pain and

suffering, made worse by Associational Defendants' aiding and abetting her son's attackers. Ayelet brings a claim on her own behalf and on behalf of her son under the Alien Tort Statute against Associational Defendants for aiding and abetting the murder of her son and the kidnapping of his remains by Hamas in violation of the law of nations.

19. Plaintiff Talik Gvili, an Israeli citizen, is the mother of Sergeant First Class Ran Gvili, a patrol officer who was attacked and killed defending Kibbutz Alumim during the October 7 attack. Despite his injuries, Ran continued to engage his terrorist attackers, exemplifying exceptional bravery. Hamas kidnapped Ran's body and has held him hostage in Gaza ever since. Ran was officially declared deceased on January 31, 2024. His family, enduring a prolonged period of uncertainty, held onto hope until his death was confirmed. Talik brings a claim on her own behalf and on behalf of her son under the Alien Tort Statute against Associational Defendants for aiding and abetting the murder of her son and the kidnapping of his remains by Hamas in violation of the law of nations.

20. Roe Baruch, an Israeli citizen, is the brother of Uriel Baruch a 35-year-old father of two who attended the Supernova music festival in southern Israel on October 7. During the event, Hamas terrorists launched a brutal attack, leading to Uriel's abduction and subsequent captivity in Gaza. At first, his family, including his brother Roe, held onto hope, believing Uriel was alive. Tragically, in March 2024, the Israeli military informed them that Uriel had been killed on October 7 and that Hamas was continuing to hold his body captive in Gaza. Roe brings a claim on his own behalf and on behalf of his brother under the Alien Tort Statute against Associational Defendants for aiding and abetting the murder of his brother and the kidnapping of his remains by Hamas in violation of the law of nations.

21. James Poe, an Israeli citizen, is the father of Leo Poe, who was kidnapped by Hamas terrorists from the Nova music festival on October 7. On the day of the massacre, Leo was serving as a member of the festival's security team alongside his close friends, who was murdered during the attack. Hamas attacked kidnapped Leo and took him to Gaza, where he remains to this day in an ongoing act of terror. Poe brings a claim on his own behalf and on behalf of his son under the Alien Tort Statute against Associational Defendants for aiding and abetting the kidnapping of his son by Hamas in violation of the law of nations.

### **THE DEFENDANTS**

22. Defendant Nerdeen Kiswani is sued individually and as the representative of Within Our Lifetime. Kiswani is the co-founder, chair, and de facto president of Within Our Lifetime, which she founded in 2015 as "New York Students for Justice in Palestine." In 2018, Kiswani rebranded the organization to expand beyond students. Since then, Within Our Lifetime has been an instrumental ally for Hamas that spreads propaganda, organizes violent and racist riots and demonstrations, and promotes chaos and fear across New York City. Kiswani personally advocates for the destruction of the State of Israel "by any means necessary" and has positioned herself as one of the loudest pro-Hamas voices throughout New York City. Both Kiswani and her organization, Within Our Lifetime, are responsible for inciting many of the most horrific, violent, and hateful pro-Hamas riots through New York City.<sup>5</sup>

23. Defendant Maryam Alwan is sued individually and as the representative of Columbia SJP. On information and belief, Alwan is the president or de facto president of Columbia SJP. Columbia SJP is the NSJP's Columbia University affiliate. Columbia SJP was the leading organizer of pro-Hamas disruptions, encampments, and riots on Columbia's campus, including

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<sup>5</sup> *Nerdeen Kiswani*, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/individual/Nerdeen\\_Kiswani](https://canarymission.org/individual/Nerdeen_Kiswani).

virulent antisemitic protests that harassed and physically intimidated Jewish students and faculty, glorified Hamas, engaged in significant and dangerous premeditated unlawful acts, and significantly impaired Columbia University's ability to provide educational services to its students. These indefensible activities led Columbia to suspend Columbia SJP in November 2023. But through intermediaries, Columbia SJP continues operating covertly. The bases for the belief that Alwan leads Columbia SJP is that she has publicly identified herself as an active member, leader, and organizer of Columbia SJP, including in a lawsuit she jointly filed with Columbia SJP.<sup>6</sup>

24. Defendant Cameron Jones is sued individually and as the representative of Columbia JVP. On information and belief, Cameron Jones is the president or de facto president of Columbia JVP. Columbia JVP is the Columbia chapter of Jewish Voice for Peace ("JVP"), a national "partner" of AMP/NSJP.<sup>7</sup> JVP's own leadership has confirmed that it views itself as an "enemy" and "opponent" of the Jewish community and sees its goal as creating "a wedge" within the American Jewish community to create the impression of weakened Jewish support for the State of Israel.<sup>8</sup> Columbia JVP often coordinates with Columbia SJP and, like its national partner, is used to provide a cover so that AMP/NSJP affiliates can avoid allegations of antisemitism. Columbia JVP was suspended from Columbia's campus alongside Columbia SJP. The bases for the belief that Jones leads Columbia JVP include that he publicly identifies himself as an active

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<sup>6</sup> Maryam Alwan, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/individual/Maryam\\_Alwan](https://canarymission.org/individual/Maryam_Alwan); see also *Columbia Students for Justice in Palestine v. Trustees of Columbia University in the City of New York*, No. 152220/2024 (Sup. Ct. N.Y. Cty.) ("Columbia SJP v. Columbia").

<sup>7</sup> Jewish Voice for Peace (@jvplive), X (Feb. 7, 2013), <https://x.com/jvplive/status/299684288562081793>; *Jewish Voice for Peace and American Muslims for Palestine Respond to Islamophobic Personal Attacks*, JEWISH VOICE FOR PEACE (last visited Mar. 23, 2025) <https://www.jewishvoiceforpeace.org/2017/05/11/jvp-amp-respond-islamophobic-pers>.

<sup>8</sup> *Driving a Wedge: JVPs Strategy to Weaken U.S. Support for Israel by Dividing the Jewish Community*, NGO Monitor (July 8, 2013), [https://ngo-monitor.org/reports/driving\\_a\\_wedge\\_jvp\\_s\\_strategy\\_to\\_weaken\\_u\\_s\\_support\\_for\\_israel\\_by\\_dividing\\_the\\_jewish\\_community/](https://ngo-monitor.org/reports/driving_a_wedge_jvp_s_strategy_to_weaken_u_s_support_for_israel_by_dividing_the_jewish_community/).

member and lead organizer of Columbia JVP, including in a lawsuit he jointly filed with Columbia JVP.<sup>9</sup>

25. Defendant Mahmoud Khalil is sued individually and as the representative of CUAD, Columbia SJP, and Columbia JVP. Khalil is the public face and de facto president of CUAD. On information and belief, Khalil is also the de facto president of Columbia SJP and Columbia JVP.<sup>10</sup> CUAD was originally founded in 2016 as a collection of Columbia student organizations that supported the Boycott, Divest, and Sanction (“BDS”) movement. CUAD remained largely dormant for years until November 2023 after Columbia SJP and Columbia JVP were suspended and began operating directly through CUAD. Since then, Khalil has been the public-facing leader of CUAD. Khalil (i) was among the spokespeople for the so-called “Gaza Solidarity Encampment” (“Encampment”) at Columbia University, a prolonged pro-Hamas propaganda effort; (ii) threatened “escalation” on behalf of CUAD if its demands were not met; (iii) organized and led the actions of CUAD and Columbia SJP and Columbia JVP, which operate through CUAD; and (iv) on information and belief, directly coordinates with Hamas, AMP/NSJP, and/or other agents and affiliates of Hamas and related foreign terrorist organizations. On March 9, 2025, Khalil was detained by U.S. Immigration and Customs Enforcement pending his removal from the United States of America, upon information and belief, based on many of his actions described in this Complaint.<sup>11</sup>

### **JURISDICTION AND VENUE**

26. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1350.

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<sup>9</sup> *Cameron Jones*, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/individual/Cameron\\_Jones](https://canarymission.org/individual/Cameron_Jones); *see also* *Columbia SJP v. Columbia*.

<sup>10</sup> This allegations is made in the alternative to the allegations that Alwan and Jones are *de facto* leaders of Columbia SJP and Columbia JVP.

<sup>11</sup> *Mahmoud Khalil*, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/individual/Mahmoud\\_Khalil](https://canarymission.org/individual/Mahmoud_Khalil).



27. This Court has personal jurisdiction under 18 U.S.C. §§ 2333(a) and 2334.

28. Venue is proper in this Court under 18 U.S.C. § 2334(a), which permits claims under the Antiterrorism Act to be brought “in the district court ... for any district where any plaintiff resides or where any defendant resides.” The Defendants are New York residents operating four unincorporated associations—Within Our Lifetime, Columbia SJP, Columbia JVP, and CUAD—that are based in New York and operate exclusively in New York.<sup>12</sup>

### **FACTUAL ALLEGATIONS**

#### **I. INTRODUCTION TO HAMAS**

29. In 1987, after starting the “First Intifada”—a murderous string of terrorist attacks directed at defenseless civilians—the International Muslim Brotherhood’s Gaza branch splintered into a new terrorist group: Hamas.<sup>13</sup> Hamas rejects Israel’s right to exist. Instead, it engages in terrorism—“jihad”—to implement an Islamist state “from the [Jordan] River to the [Mediterranean] Sea,”<sup>14</sup> a reference to the entire State of Israel.

30. One of the primary purposes for Hamas’ terrorism, even from its inception, has been to prevent Israel from building and developing global relationships, particularly as it pertains to its Arab neighbors. For this reason, Hamas’ largest waves of terror often coincide with disrupting major peace negotiations or agreements between Israel and its neighbors.<sup>15</sup>

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<sup>12</sup> On information and belief, the Defendants also satisfy N.Y. Gen. Ass’n L. § 13.

<sup>13</sup> Kali Robinson, *What is Hamas?*, COUNCIL ON FOREIGN RELATIONS (last updated Apr. 28, 2024), <https://www.cfr.org/background/what-hamas>.

<sup>14</sup> AMERICAN JEWISH COMMITTEE, “FROM THE RIVER TO THE SEA” (last visited Mar. 23, 2025), <https://www.ajc.org/translate/From-the-River-to-the-Sea>; ANTI-DEFAMATION LEAGUE, SLOGAN: “FROM THE RIVER TO THE SEA PALESTINE WILL BE FREE” (Oct. 26, 2023), <https://www.adl.org/resources/background/slogan-river-sea-palestine-will-be-free>.

<sup>15</sup> David D. Kirkpatrick & Adam Rasgon, *The Hamas Propaganda War* (Oct. 30, 2023) (stating Hamas’ October 7 attack was “a premeditated coup against the Arab-Israeli peace plan”), <https://www.newyorker.com/news/news-desk/the-hamas-propaganda-war>.

31. On October 8, 1997, the U.S. State Department officially designated Hamas as a foreign terrorist organization (“FTO”). Hamas’ FTO status has been reaffirmed twice. It remains an FTO today.<sup>16</sup>

32. Hamas relies on a three-pronged strategy to pursue its terroristic aims:

- a. **First**, Hamas uses indiscriminate, violent acts of terror against Israeli civilians, including suicide bombings, shootings, stabbings, and rocket attacks.<sup>17</sup>
- b. **Second**, Hamas uses non-combatant Palestinians—its own people—as human shields. For Hamas, this is a win-win scenario: Either Israel determines that the risk of killing non-combatants is too great and does not engage in the battle, or Israel determines that the risk of not acting is too great and engages in the operations, which allows Hamas to accuse Israel of murdering innocent people.
- c. **Third**, Hamas relies on propaganda to demonize Israel, glorify its “resistance” efforts, and cast itself as a victim of mythical “settler-colonial” oppressors—Israel and the Jewish people.

33. International propaganda, particularly propaganda directed at Western nations like the United States, is central to Hamas’ strategy. Indeed, Hamas stresses the importance of propaganda in its Charter:

Our struggle against the Jews is very great and very serious. It needs all sincere efforts. It is a step that inevitably should be followed by other steps. The Movement is but one squadron that should be supported by more and more squadrons from this vast Arab and Islamic world, until the enemy is vanquished and Allah’s victory is realised. ... In face of the Jews’ usurpation of Palestine, it is compulsory that the banner of Jihad be raised. To do this requires the diffusion of Islamic consciousness among the masses, both on the regional, Arab and Islamic levels. It is necessary to instill the spirit of Jihad in the heart of the nation so that they would confront the enemies and join the ranks of the fighters.

It is necessary that scientists, educators and teachers, information and media people, as well as the educated masses, especially the

<sup>16</sup> See CRS REPORT FOR CONGRESS, FOREIGN TERRORIST ORGANIZATIONS 27-30 (Feb. 6, 2004), <https://irp.fas.org/crs/RL32223.pdf>.

<sup>17</sup> See generally HAMAS, THE COVENANT OF THE ISLAMIC RESISTANCE MOVEMENT (Aug. 18, 1988), [https://avalon.law.yale.edu/20th\\_century/hamas.asp](https://avalon.law.yale.edu/20th_century/hamas.asp).

youth and sheikhs of the Islamic movements, should take part in the operation of awakening (the masses). It is important that basic changes be made in the school curriculum . . . . The Crusaders realised that it was impossible to defeat the Moslems without first having ideological invasion pave the way by upsetting their thoughts, disfiguring their heritage and violating their ideals. Only then could they invade with soldiers.

[We] hope[] that all these groupings will side with it in all spheres, would support it, adopt its stand and solidify its activities and moves, work towards rallying support for it so that the Islamic people will be a base and a stay for it, supplying it with strategic depth an all human material and informative spheres, in time and in place. This should be done through the convening of solidarity conferences, the issuing of explanatory bulletins, favourable articles and booklets, enlightening the masses regarding the Palestinian issue . . . so that these peoples would be equipped to perform their role in the decisive battle of liberation.<sup>18</sup>

34. “Propaganda plays a critical role for Hamas as it seeks to shore up its popularity” and is designed to “paint Israel as an oppressive occupier whose military operations and policies harm Palestinians, especially innocent civilians, including children.”<sup>19</sup> Hamas’ terror-by-propaganda strategy, which relies heavily on preexisting and historical anti-Jewish hatred and biases, “transcends conventional warfare tactics, . . . generate[s] global condemnation of Israel, hamstring[s] the IDF’s operations, and protect[s] Hamas’ military capabilities under the guise of civilian safety.”<sup>20</sup>

35. Today, Hamas is largely funded, trained, and controlled by the Islamic Republic of Iran’s IRGC, another FTO. Hamas and the IRGC share the common goal of destroying Israel and the United States.

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<sup>18</sup> HAMAS, THE COVENANT OF THE ISLAMIC RESISTANCE MOVEMENT (Aug. 18, 1988), [https://avalon.law.yale.edu/20th\\_century/hamas.asp](https://avalon.law.yale.edu/20th_century/hamas.asp).

<sup>19</sup> Daniel Byman & Emma McCaleb, *Understanding Hamas’s and Hezbollah’s Uses of Information Technology*, CTR. FOR STRATEGIC & INT’L STUDS. (July 31, 2023), <https://www.csis.org/analysis/understanding-hamass-and-hezbollahs-uses-information-technology>.

<sup>20</sup> Joshua Klein, *Exclusive: Renown Urban Warfare Expert John Spencer Warns ‘World Playing Into Hamas’s Strategy’*, BREITBART (Apr. 1, 2024), <https://www.breitbart.com/politics/2024/04/01/exclusive-renown-urban-warfare-expert-john-spencer-warns-world-playing-hamass-strategy/>.

## II. HAMAS' AMERICAN PROPAGANDA DIVISION

### A. *The "Palestine Committee"*

36. In 1988, the Muslim Brotherhood and Hamas founded the "Palestine Committee" to serve as Hamas' terrorist funding and support enterprise in the United States.<sup>21</sup> The Palestine Committee was a network of like-minded organizations that disregarded corporate forms and legal requirements. The Palestine Committee directly coordinated with Hamas to help achieve its goals in the United States. For example, in 1993, the FBI wiretapped a meeting between the Palestine Committee and Hamas operatives in the United States that

show[s] internal discussions on how to improve activities in support of Hamas within the US and how to shield them from the designation of Hamas as a terrorist organization. US-based Hamas activists agreed that hiding their affiliation and intentions was the best tactic to avoid negative consequences. "I swear by Allah that war is deception," said one senior leader, "[d]eceive, camouflage, pretend that you're leaving while you're walking that way. Deceive your enemy." "Let's not hoist a large Islamic flag and let's not be barbaric-talking. We will remain a front so that if the thing [the U.S. government ban on Hamas] happens, we will benefit from the new happenings instead of having all of our organizations classified and exposed."<sup>22</sup>

37. The wiretapped meeting centered around the Palestine Committee's assurance to Hamas that, following the Oslo Accords, it remained committed to promoting Hamas' goal of derailing Israel's normalization and peace efforts by assisting on all fronts: financial, informational, and political.

38. The Palestine Committee consisted of several organizations. The most relevant here are the Holy Land Foundation for Relief and Development ("HLF"), the Islamic Association for

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<sup>21</sup> Lorenzo Vidino, *The Hamas Networks in America: A Short History*, GW PROGRAM ON EXTREMISM, at 5, 7–8 (Oct. 2023), <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-10/hamas-networks-final.pdf>.

<sup>22</sup> Lorenzo Vidino, *The Hamas Networks in America: A Short History*, GW PROGRAM ON EXTREMISM, at 5 (Oct. 2023), <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-10/hamas-networks-final.pdf>.

Palestine (“IAP”), and IAP’s many alter egos, including the American Muslim Society (“AMS”). HLF served as Hamas’ fundraising arm in the United States. IAP’s “primary function was to serve as the public voice of Hamas in the United States.”<sup>23</sup> AMS was originally incorporated as a separate organization, but merged with IAP and operated as one of its many alter egos.<sup>24</sup>

39. HLF and IAP were both founded and controlled by members of Hamas’ senior leadership. For example, IAP was founded by Khaled Mashal, the current Acting Chairman of the Hamas Political Bureau.<sup>25</sup> Mr. Mashal described IAP as one of the “first pillars” of Hamas’ terrorist organization.<sup>26</sup> IAP was heavily financed by Mousa abu Marzook, a “Specially Designated Global Terrorist.”<sup>27</sup>

40. In 2001, the United States Office of Foreign Asset Control designated HLF a “Specially Designated Global Terrorist.”<sup>28</sup> Then, in 2008, HLF and five of its leaders—often referred to by Hamas and its allies as the “Holy Land 5”—were convicted of providing material support to Hamas.<sup>29</sup> Among many other things, evidence at trial established “numerous donation checks” were “for Palestinian Mujahidden [martyrs] only.”<sup>30</sup>

<sup>23</sup> Matthew Levitt, *Hamas: Politics, Charity, and Terrorism in the Service of Jihad*, 151 (2006).

<sup>24</sup> See *Boim v. Am. Muslims for Palestine*, 9 F.4th 545, 548 (7th Cir. 2021) (recognizing, as several courts have, that AMS was an alter ego of IAP).

<sup>25</sup> *Head of Hamas Abroad Khaled Mashal: Only Jihad Will Restore Our Rights*, Memri (Mar. 10, 2025), <https://www.memri.org/tv/khaled-mashal-hamas-abroad-jihad-resistance-battlefield>; *Hamas’ Mashaal Rejects Trump’s Gaza Plan, Vows to Pursue ‘Jihad and Resistance’*, ISRAEL NATIONAL NEWS (Mar. 17, 2025), <https://www.israelnationalnews.com/news/405475>; *Hamas: What Has Happened to its Most Prominent Leaders?*, BBC (Jan. 21, 2025), <https://www.bbc.com/news/world-middle-east-67103298>; *Mapping Palestinian Politics – Khaled Mashal*, EUROPEAN COUNCIL ON FOREIGN RELATIONS, [https://ecfr.eu/special/mapping\\_palestinian\\_politics/khaled\\_mashal/](https://ecfr.eu/special/mapping_palestinian_politics/khaled_mashal/).

<sup>26</sup> Garry M. Servold, *The Muslim Brotherhood and Islamic Radicalism*, KNOW THY ENEMY: PROFILES OF ADVERSARY LEADERS AND THEIR STRATEGIC CULTURES, at 61–62 (Barry R. Schneider & Jerrold M. Post eds., 2003), <https://www.airuniversity.af.edu/Portals/10/CSDS/Books/knowthyenemy3.pdf>.

<sup>27</sup> OFFICE OF FOREIGN ASSET CONTROL, SANCTIONS LIST SEARCH: MOUSA ABU MARZOOK A/K/A ABU OMAR, ABU UMAR, ABU RIZQ, <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=3754>.

<sup>28</sup> OFFICE OF FOREIGN ASSET CONTROL, SANCTIONS LIST SEARCH: HOLY LAND FOUNDATION FOR RELIEF AND DEVELOPMENT, <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=7116>.

<sup>29</sup> See Press Release, Federal Judge Hands Down Sentences in Holy Land Foundation Case, U.S. DEP’T OF JUSTICE (Mar. 27, 2009), <https://www.justice.gov/opa/pr/federal-judge-hands-down-sentences-holy-land-foundation-case>.

<sup>30</sup> *From Ivory Towers to Dark Corners: Investigating the Nexus between Antisemitism, Tax-Exempt Universities, and Terror Financing: Hearing before the House Committee on Ways and Means*, 118 Cong. (2023), at 8

41. In December 2004, after an IAP alter ego was found civilly liable for funneling money to Hamas in violation of the Antiterrorism Act, IAP dissolved.<sup>31</sup>

42. Hamas' initial material support enterprise was so significant to Hamas that, on October 9, 2023, Hamas officials explained that one of their motivations for their October 7 terrorist attack included demanding the release of the terrorist financiers convicted in the HLF trial.

### ***B. AMP and NSJP***

43. Shortly after the original material support enterprise for Hamas—including HLF and IAP—was exposed, its architects worked to resurrect the enterprise in a way that would more effectively hide their actions. In 2006, several of the original enterprise's key members founded AMP to fill the gap left by the loss of IAP. That is, to—once again—provide Hamas with an effective propaganda and recruiting arm in the United States.

44. There is “significant overlap between AMP and people who worked for or on behalf of organizations that were designated, dissolved, or held civilly liable by federal authorities for supporting Hamas.”<sup>32</sup>

45. Hatem Bazian, a former speaker and fundraiser for the Palestine Committee, is the founder and Chairman of AMP and, while acting as a professor at the University of California at

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(“Schanzer 2023 Congressional Testimony”), <https://gop-waysandmeans.house.gov/wp-content/uploads/2023/11/Schanzer-Testimony.pdf>.

<sup>31</sup> See *Boim v. Holy Land Found. for Relief & Dev.*, 549 F.3d 685, 701 (7th Cir. 2008).

<sup>32</sup> *Israel Imperiled: Threats to the Jewish State: Joint Hearing before the Subcomm. on Terrorism, Nonproliferation, and Trade & the Subcomm. on the Middle East and North Africa*, 114 Cong. 156 (2016) (Statement of Jonathan Schanzer) (“Schanzer 2016 Congressional Testimony”), <https://docs.house.gov/meetings/FA/FA18/20160419/104817/HHRG-114-FA18-Wstate-SchanzerJ-20160419.pdf?ref=stanfordreview.org>.

Berkeley, founded the first Students for Justice in Palestine chapter.<sup>33</sup> Bazian believes that “[i]t is about time we have an intifada in [the United States].”<sup>34</sup>

46. Osama Abuirshaid, the Executive Director and National Board Member of AMP was a former Board Member of IAP/AMS. Mr. Abuirshaid specializes in creating and publishing propaganda for Hamas and its allies. He has interviewed Hamas leadership<sup>35</sup> and been featured on the website of the al-Qassam Brigades: the military wing of Hamas.<sup>36</sup> In 2021, Mr. Abuirshaid spoke at a conference alongside Leila Khaled (a convicted airplane hijacker),<sup>37</sup> Sami Khater (a Hamas co-founder), and Mohammad Nazzal (a Hamas Senior Official and Specially Designated Global Terrorist).<sup>38</sup> Abuirshaid also regularly travels to Turkey, where he meets with Sami Al-Arian, who was convicted in the United States in 2006 for providing material support to Palestinian Islamic Jihad, another FTO operating in Gaza.<sup>39</sup> Indeed, Abuirshaid believes that his support for Hamas and his regular travels have landed him on a U.S. government terror watch list.<sup>40</sup>

<sup>33</sup> Eitan Fischberger, *The Long March of Radicalization*, CITY JOURNAL (Oct. 16, 2023), <https://www.city-journal.org/article/the-long-march-of-radicalization>; Daniel Mael, *On Many Campuses, Hate is Spelled SJP*, THE TOWER (Oct. 2014), <https://www.thetower.org/article/on-many-campuses-hate-is-spelled-sjp/>.

<sup>34</sup> Hamas on Campus, *Radical Hatem Bazian calls for Intifada (armed uprising) in the USA!!*, YOUTUBE (Mar. 23, 2015), <https://www.youtube.com/watch?v=Mfv5yaKxNgo>.

<sup>35</sup> Osama Abuirshaid, *The Dialectic of Religion and Politics in Hamas's Thought and Practice* (March 22, 2013) (Ph.D. thesis, Loughboro University).

<sup>36</sup> Osama Abuirshaid, “دعز متويفقا نويمكر بعز” [Arabs are plotting the Gaza resistance,” Al-Qassam (Palestinian Authority), July 19, 2014. (Archived version available at <https://www.alqassam.ps/arabic/ملقساا-تمقالا-4746/برء-دعز-متويفقا-نويمكر>).

<sup>37</sup> *Head of Palestinian American lobby group joins conference with terror-group members*, JEWISH NEWS SYNDICATE (Dec. 3, 2021), <https://www.jns.org/head-of-palestinian-american-lobby-group-joins-conference-with-terror-group-members/>.

<sup>38</sup> *Id.*; see also *Press Release, Treasury Targets Key Hamas Leaders and Financiers*, Department of Treasury (Nov. 19, 2024) (“[Nazzal] is a Hamas official who has provided support to the terrorist group for over 30 years. As a senior leader serving on Hamas’s Council on International Relations, Nazzal represents Hamas’s interests to a variety of international audiences.”), <https://home.treasury.gov/news/press-releases/jy2720>.

<sup>39</sup> See @JSchanzer, X (formerly Twitter) (May 5, 2024, 10:04 AM), <https://x.com/JSchanzer/status/1787121140311171531>; Press Release, U.S. Dep’t of Justice, Sami Al-Arian Pleads Guilty To Conspiracy To Provide Services To Palestinian Islamic Jihad (Apr. 17, 2006), [https://www.justice.gov/archive/opa/pr/2006/April/06\\_crm\\_221.html](https://www.justice.gov/archive/opa/pr/2006/April/06_crm_221.html).

<sup>40</sup> Complaint, *Abu Irshaid v. Garland*, No. 1:24-cv-01405 (E.D. Va. filed Aug. 12, 2024); Ohad Merlin, *Muslim Brotherhood vs. United States of America? FBI Sued Over Alleged Terror Lists*, JERUSALEM POST (Aug. 29, 2024) <https://www.jpost.com/international/islamic-terrorism/article-816997>.



47. In 2010, AMP organized and sponsored the first ever National Students for Justice in Palestine Convention to unite Students for Justice in Palestine (“SJP”) chapters that had been operating at different American colleges and universities. The conference was held at Columbia.<sup>41</sup> At the convention, AMP announced the creation of NSJP—AMP’s new on-campus program—designed to control the management, financing, and messaging of SJP Chapters across the country.<sup>42</sup>

48. NSJP has no formal corporate structure of its own but operates as AMP’s college campus brand. AMP maintains organizational management and control of NSJP, and in 2022, developed a new centralized approach that provides it with even more control over the affairs of individual SJP chapters.<sup>43</sup>

49. Today, NSJP operates as an “umbrella organization” for American SJP chapters, which allows AMP to push unified propaganda, messaging, and tactics to be deployed by each of their subsidiary organizations while still maintaining the façade that SJP chapters are independent, student-operated campus clubs. In reality, with NSJP as its central control apparatus, AMP uses individual SJP chapters to serve as Hamas’ propaganda agents across college campuses.

50. NSJP and its individual affiliated chapters operate through a network of encrypted messaging apps and email services often linked to international terrorism.<sup>44</sup> NSJP uses these

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<sup>41</sup> *Students for Justice in Palestine (SJP)*, ANTI-DEFAMATION LEAGUE (last visited Mar. 23, 2025), <https://www.adl.org/resources/backgrounder/students-justice-palestine-sjp>.

<sup>42</sup> Charles Asher Small et al., *Antisemitism Violent Extremism and the Threat to North American Universities: The Contextualization of the National Students for Justice in Palestine*, INSTITUTE FOR THE STUDY OF GLOBAL ANTISEMITISM AND POLICY, at 12 (Oct. 2019) (“ISGAP 2019”), <https://isgap.org/wp-content/uploads/2019/10/NSJP-2019-ISGAP-Report-Long-Version.pdf>.

<sup>43</sup> *You Cannot Profit Off Our People’s Blood and Think Students Will Not Come For Your Money*, HAMMER & HOPE (Spring 2024), <https://hammerandhope.org/article/palestine-college-students>.

<sup>44</sup> Arno Rosenfeld, *The Secret History and Uncertain Future of Students for Justice in Palestine*, FORWARD (Dec. 20, 2023) <https://forward.com/news/574014/students-for-justice-in-palestine-history-operations-network-national-sjp/>; Robert Graham, *How Terrorists Use Encryption*, COMBATING TERRORISM CENTER (June 2016) <https://ctc.westpoint.edu/how-terrorists-use-encryption/>.



secretive means to guide local chapters with core principles of anti-Zionism and “anti-normalization.”<sup>45</sup> Some chapters even use pseudonymous names to hide their NSJP affiliations.<sup>46</sup>

51. AMP openly fosters, controls, and develops campus activism through NSJP. For example, a recent AMP annual conference featured a “Youth Program” that included an “SJP Workshop.” The conference also included the “Campus Activism Track”—a specific program for students—designed to increase “solidarity between SJP chapters.”<sup>47</sup>

52. NSJP regularly (1) identifies itself as a supporter of, and sometimes even part of, Hamas and its affiliates’ movement; (2) disseminates instructions from Hamas and other FTOs; (3) hosts speakers that are Specially Designated Global Terrorists or affiliated with them; and (4) provides direct aid to the same.

53. In addition, AMP also controls certain media accounts for national JVP, an ostensibly Jewish organization that identifies itself as a “Partner” of AMP/NSJP.<sup>48</sup> AMP’s ultimate control of JVP and its individual chapters, like its control of NSJP and individual SJP Chapters, appears to go further than a “Partnership.” Indeed, upon information and belief, AMP has at least partial control over JVP and its individual chapters’ operations.

54. AMP’s purpose in controlling these campus organizations has three major goals: (1) normalize Hamas’ terrorism in Western academia and society through the use of expert propaganda materials and coercive threats of unlawful behavior and/or violence; (2) recruit college

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<sup>45</sup> Arno Rosenfeld, *The Secret History and Uncertain Future of Students for Justice in Palestine*, FORWARD (Dec. 20, 2023) <https://forward.com/news/574014/students-for-justice-in-palestine-history-operations-network-national-sjp/>.

<sup>46</sup> *Id.*

<sup>47</sup> Though AM/NSJP used to publicize and market the CAT Program, the link to the CAT Program has since been deleted.

<sup>48</sup> Jewish Voice for Peace (@jvplive), X (Feb. 7, 2013), <https://x.com/jvplive/status/299684288562081793>; *Jewish Voice for Peace and American Muslims for Palestine Respond to Islamophobic Personal Attacks*, JEWISH VOICE FOR PEACE (Mar. 11, 2017) <https://www.jewishvoiceforpeace.org/2017/05/11/jvp-amp-respond-islamophobic-pers.>; Dr. Hatem Bazian (@HatemBazian), X (May 12, 2023) (stating Bazian is “an ally an partner with Jewish Voice for Peace”), <https://x.com/HatemBazian/status/1657078082589835264>.

students to support Hamas; and (3) establish an environment on American college campuses where Jews are *persona non grata* and violence against them is accepted, justified, and even lionized.

55. In short, AMP/NSJP are Hamas' current material support enterprise. They not only provide Hamas a public relations and propaganda division, but they also recruit foot soldiers to engage in direct acts of violence, destroy property, disrupt critical academic and economic centers, and generally incite fear and chaos in support of Hamas' American Intifada. The purpose of these actions is to (i) intimidate and coerce the American people to forsake Israel and support Hamas; (ii) influence United States policy through intimidation and coercion to shift away from Israel and toward Hamas; and (iii) to affect the conduct of the United States government. These activities are instrumental to Hamas' short and long-term goal of weakening Israel and allowing Hamas to engage in its acts of international terrorism with less resistance.

### ***C. Columbia SJP and Columbia JVP***

56. AMP/NSJP have been highly successful in achieving their goals in New York City and on the campus of Columbia University. This is largely because of the aggressive, militant approach taken by their local affiliates: Columbia SJP and Columbia JVP.

57. Columbia SJP provides AMP/NSJP with a presence on Columbia University's campus. For years, Columbia SJP has been one of the most active and aggressive NSJP campus affiliates in the nation. With AMP/NSJP's direction and support, Columbia SJP has hosted rallies, invited terrorists to campus, incited riots, spearheaded BDS campaigns, and intentionally designed its activities to intimidate Jewish students, faculty, and staff.

58. Columbia JVP, like Columbia SJP, has been one of the most active and aggressive national JVP campus affiliates in the nation. AMP/NSJP has at least some significant control over national JVP's messaging and operations. It is thus not surprising that Columbia JVP maintains a

tight-knit relationship with Columbia SJP akin to the close relationship between their national partners, which—again—are controlled by AMP/NSJP. Indeed, Columbia JVP partners with Columbia SJP on most, if not all, of its most significant events supporting Hamas' cause.

59. Columbia JVP is a valuable tool to AMP/NSJP—and to Hamas—because it allows for dissemination of pro-Hamas propaganda through allegedly Jewish spokespersons, which helps shield against allegations of anti-Jewish rhetoric and intentions.

60. One of the principal components of the partnership between Columbia SJP and Columbia JVP is their 2016 creation of CUAD. CUAD was initially founded by Columbia SJP and Columbia JVP to create a partnership of numerous on-campus student organizations to support the BDS movement against Israel. Though approximately 100 student organizations joined CUAD at one point or another, the organization has, at all relevant times, been primarily controlled by the Columbia SJP and Columbia JVP.

61. While Columbia SJP, Columbia JVP, and CUAD provide AMP/NSJP with a significant force on Columbia's campus, Within Our Lifetime serves as AMP/NSJP's chief operating partner and ally throughout New York City as a whole.

62. Kiswani is a critical component of the AMP/NSJP ecosystem. In 2015, while enrolled at the City University of New York School of Law, she helped found New York City Students for Justice in Palestine. In 2018, Kiswani rebranded New York City Students for Justice in Palestine as Within Our Lifetime, allowing her to expand the organization beyond students and direct it to the city at large.

63. Within Our Lifetime, controlled by Kiswani, has, at all relevant times, affiliated itself with Hamas, its original material support enterprise, and AMP/NSJP, Hamas' current captive propaganda firm. Among many other things, Within Our Lifetime has, long before October 7, (i)

incited violent riots in support of Hamas;<sup>49</sup> (ii) disseminated a “toolkit” for Hamas protests that parrots Hamas and AMP/NSJP chants and marketing materials such as “Globalize the Intifada!” and “From the River to the Sea! Palestine is Arab!”<sup>50</sup>; (iii) dedicated substantial efforts to AMP/NSJP’s pet projects, such as demanding the release of the “Holy Land 5” and Sami Al-Arian<sup>51</sup>; and (iv) collaborates with Hamas-affiliated FTOs like the Popular Front for the Liberation of Palestine (“PFLP”) and Samidoun.<sup>52</sup>

64. The Associational Defendants’ provision of propaganda and recruiting services for Hamas is especially valuable to Hamas because New York City is a dense urban center and an unparalleled hub for academia, economics, technology, media, entertainment, and the arts.

### III. HAMAS’ ACTS OF INTERNATIONAL TERRORISM

#### A. *The October 7 Attack*

65. On October 7, 2023, Hamas—in collaboration with the IRGC, PFLP, and other terrorist organizations in Gaza—attacked Southern Israel. Hamas terrorists marched town to town, house to house, and car to car with the sole aim of causing as much death, pain, and destruction as possible. They brutalized, maimed, raped, and murdered entire families.<sup>53</sup> Much of Hamas’ worst savagery was saved for women, children, infants, and the elderly.

<sup>49</sup> See, e.g., *Within Our Lifetime: The NYC Org Inciting its Activists to Violence*, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/campaign/NYC\\_Antisemitic\\_Violence](https://canarymission.org/campaign/NYC_Antisemitic_Violence).

<sup>50</sup> *Within Our Lifetime*, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/organization/Within\\_Our\\_Lifetime](https://canarymission.org/organization/Within_Our_Lifetime).

<sup>51</sup> *Why Within Our Lifetime Supports the ‘Holy Land 5’*, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/blog/Within\\_Our\\_Lifetime\\_Support\\_For\\_Holy\\_Land\\_Five](https://canarymission.org/blog/Within_Our_Lifetime_Support_For_Holy_Land_Five).

<sup>52</sup> *Within Our Lifetime*, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/organization/Within\\_Our\\_Lifetime](https://canarymission.org/organization/Within_Our_Lifetime).

<sup>53</sup> David Gritten, *Israeli Report Says Hamas Sexual Violence ‘Systematic and Intentional’*, BBC (Feb. 21, 2024), <https://www.bbc.com/news/world-middle-east-68365284>; U.N. OFFICE OF THE SPECIAL REPRESENTATIVE OF THE SECRETARY-GENERAL ON SEXUAL VIOLENCE IN CONFLICT, *Mission Report: Official Visit of the Office of the SRSG-SVC to Israel and the Occupied West Bank, 29 January – 14 February 2024* ¶ 12 (Mar. 4, 2024), <https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2024/03/report/mission-report-official-visit-of-the-office-of-the-srsg-svc-to-israel-and-the-occupied-west-bank-29-january-14-february-2024/20240304-Israel-oWB-CRSV-report.pdf>.

66. Hamas also targeted a local music festival, the Nova Music Festival, where thousands of people—mostly in their teens and early twenties—were gathered to not just enjoy music, but to celebrate the pursuit of peace. Hamas terrorists, some using makeshift paragliders, a new tactic for Hamas, attacked the Nova Music Festival, murdering more than 260 innocent festival goers.<sup>54</sup>

67. Hamas also kidnapped more than 200 civilians on October 7 and brought them back to Gaza as hostages. In Gaza, hostages were murdered, tortured, raped, maimed, and otherwise subjected to abhorrent, despicable conditions. As just one example, Hamas terrorists brutally murdered two babies they took hostage, Ariel Bibas (four years old) and Kfir Bibas (nine months old), with their bare hands.<sup>55</sup> Hamas also mutilated and desecrated many of the bodies of the innocent people that they kidnapped and murdered.<sup>56</sup>

68. Hamas continues to hold hostage the bodies of those they have murdered. To this day, Hamas holds dozens of hostages, living and deceased. Hamas has refused and continues to refuse to release both living hostages and the remains of those they murdered unless Israel accedes to its political demands.<sup>57</sup>

69. The victims of these unspeakable crimes include:

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<sup>54</sup> *What Is Known About Israeli Hostages Taken by Hamas*, AM. JEWISH COMM. (Feb. 26, 2024), <https://www.ajc.org/news/what-is-known-about-israeli-hostages-taken-by-hamas>.

<sup>55</sup> “*In Cold Blood*”: Hamas Murdered Bibas Children with Bare Hands, Sent Unidentified Body in Place of Shiri Bibas, FOUNDATION FOR DEFENSE OF DEMOCRACY (Feb. 21, 2025), <https://www.fdd.org/analysis/flash-briefs/2025/02/21/in-cold-blood-hamas-murdered-bibas-children-with-bare-hands-sent-unidentified-body-in-place-of-shiri-bibas/>.

<sup>56</sup> *I Can’t Erase All the Blood From My Mind: Palestinian Armed Groups’ October 7 Assault on Israel*, Human Rights Watch (July 17, 2024), <https://www.hrw.org/report/2024/07/17/i-cant-erase-all-blood-my-mind/palestinian-armed-groups-october-7-assault-israel>; Emma Bubola *et al.*, *Shani Luk, Believed Kidnapped, Was Likely Dead When She Was Taken By Hamas, Family Says*, New York Times (Oct. 30, 2023) (“Maybe there can be comfort by the thought she died fast and the abuse to her body was perhaps done when she was already gone.”), <https://www.nytimes.com/2023/10/30/world/middleeast/shani-louk-german-israel-woman-hamas-dead.html>.

<sup>57</sup> See, e.g., *Hamas lays out terms for hostage release while health officials say Israeli strikes killed 9 in Gaza*, PBS NEWS (Mar. 15, 2025), <https://www.pbs.org/newshour/world/hamas-lays-out-terms-for-hostage-release-while-health-officials-say-israeli-strikes-killed-9-in-gaza>.

- a. Judy Lynne Weinstein and Gad Haggai, who were kidnapped and murdered by Hamas and whose bodies are still held hostage, and their daughter Iris Weinstein Haggai, who has suffered immeasurable mental and emotional distress over Hamas' crimes against her parents;
- b. Yonatan Samerano, who was murdered by Hamas and whose body is still held hostage, and his mother Ayelet Samerano, who has suffered immeasurable mental and emotional distress over Hamas' crimes against her son;
- c. Ran Gvili, who was murdered by Hamas and whose body is still held hostage, and his mother Talik Gvili, who has suffered immeasurable mental and emotional distress over Hamas' crimes against her son;
- d. Uriel Baruch, who was murdered by Hamas and whose body is still held hostage, and his brother Roei Baruch, who has suffered immeasurable mental and emotional distress over Hamas' crimes against his brother;
- e. Shlomi Ziv, who was kidnapped and held hostage by Hamas for 246 days until his recovery in a rescue operation; and
- f. Leo Poe, who was kidnapped by Hamas and remains a hostage to this day, and James Poe, who has suffered immeasurable mental and emotional distress over Hamas' crimes against his son.

***B. Attacks on Israeli Soldiers and Civilians***

70. Following October 7, Israel commenced military operations in Gaza, including air strikes and ground attacks. Hamas terrorists have engaged in countless attacks against Israeli forces, resulting in the deaths of hundreds of Israelis.

71. As an FTO, Hamas is not a lawful military force and cannot engage in lawful acts of war. Every attack by Hamas is an individual act of international terrorism as well as part of the ongoing, continuing act of international terrorism that began on October 7.

72. Hamas has also continued to engage in innumerable acts of international terrorism against innocent civilians, primarily by launching rockets at their homes and communities. These ongoing attacks force civilians to fear for their lives, evacuate and abandon their homes, and seek

safety in bomb shelters. These attacks are also individual terror acts and a component of the ongoing terror act that began on October 7.

73. Plaintiff John Doe was among those who fought Hamas in Gaza. Doe left his studies at Columbia Law School to serve in the Israeli military and spent 100 days fighting against Hamas. As a result of his combat experience, Doe suffered mental anguish, pain, and suffering. He continues to suffer from the effects of these injuries and continues to suffer ongoing mental and emotional trauma.

74. Plaintiff Richard Roe paused his studies at Columbia University to return to service with the IDF following October 7. Within 24 hours of landing, he was deployed to the Gaza Envelope, where he was repeatedly shot at by Hamas terrorists. As a result of his combat experience, Roe suffered mental anguish, pain, and suffering. He continues to suffer from the effects of these injuries and continues to suffer ongoing mental and emotional trauma.

75. On October 7, the younger brother of Plaintiff Jane Moe, a Columbia student, was deployed to Gaza, where he fought against Hamas for over a year and sustained injuries in battle. As a result, Moe has experienced severe emotional distress, exacerbated by the demonstrations on Columbia's campus that glorified the terrorists who had attempted to harm her brother.

76. Each of the crimes discussed above was an individual act of international terrorism. And viewed collectively, all the foregoing conduct, commencing on October 7 and lasting through today, constitutes a continuous act of international terrorism.

77. These acts of international terrorism were intended to prevent Israel from normalizing its relationships with its Arab neighbors. Hamas and its puppet master, the IRGC, are threatened by the success of the Abraham Accords, a landmark peace deal between Israel and several of its Arab neighbors, including for example the United Arab Emirates, negotiated and

finalized during the first Trump administration. Shortly before the events of October 7, it became apparent that Israel was preparing to normalize relations with Saudi Arabia, arguably the single most diplomatically relevant Arab nation and Iran's chief geopolitical foe. Indeed, Hamas has expressly admitted that its attack was designed to “land[] a blow to the normalization [of relations between Israel and its Arab neighbors]. What happened before will not be the same after this operation. This was one of the operation's goals.”<sup>58</sup>

#### IV. HAMAS' CALL TO ACTION

78. Within hours of its October 7 attack, Hamas issued a call for mass mobilization of its “resistance abroad” to “join the battle in any way they can.”<sup>59</sup> Indeed, “within hours of its attack on October 7, Hamas' Qatar-based politburo web operatives flipped the switch on a slickly produced global social media disinformation campaign calculated to trigger an outpouring of pro-Palestinian/anti-Israel sentiment across global social media platforms to amplify (and justify) Hamas' terror.”<sup>60</sup> Khaled Mashal—the former founder of IAP, AMP/NSJP's predecessor in Hamas' American material support enterprise—headed this campaign and told Hamas' global supporters that they should be “part of this battle.”<sup>61</sup>

The initial disinformation flood was in Arabic directed at Arab social media sites to create sympathy for Hamas for its ‘defense’ of Jerusalem's Muslim holy places and its ‘justified’ struggle to free Palestinian prisoners jailed in Israel. But its second phase unleashed

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<sup>58</sup> Velina Tchakarova (@vtchakarova), X (Oct. 21, 2023, 7:36 AM), <https://x.com/vtchakarova/status/1715693654197579867>.

<sup>59</sup> *Al-Jazeera Airs Hamas Leader Ismail Haniyeh's Statement On Hamas's Invasion Of Southern Israel: I Call On Palestinians In The West Bank, Israeli Arabs, And The Entire Nation Abroad To Join The Battle; To The Enemy I Say: Get Out Of Our Land!*, MEMRI TV (Oct. 7, 2023), <https://www.memri.org/tv/hamas-leader-ismail-haniyeh-statement-jazeera-operation-aqsa-deluge-palestinians-west-bank-israel-abroad-join-battle>.

<sup>60</sup> COALITION FOR A SAFER WEB, THE HAMAS “INFLUENCER” INTIFADA (NOV. 16, 2023) (“CSW Report”), <https://coalitionsw.org/the-hamas-influencer-intifada/>.

<sup>61</sup> *Former Hamas Leader Khaled Mashal Calls For ‘Friday Of The Al-Aqsa Flood’: Muslims Should Take To The Streets Worldwide, Join The Battle; The West, America, Zionists Will See Convoys Of Mujahideen On Their Way To Palestine*, MEMRI TV (Oct. 10, 2023), <https://www.memri.org/tv/fmr-hamas-leader-calls-muslims-world-join-battle-palestine>.



tens of thousands of fake disinfo[rmation] bots in other languages to push the Hamas anti-Israel/antisemitic narrative.<sup>62</sup>

79. Hamas has issued express guidelines detailing how its propagandists should “play their part in strengthening the home front and in properly conveying information worldwide.”<sup>63</sup> Indeed, in the wake of October 7, the Hamas Media Office released a manifesto titled “Our Narrative” that provides its propaganda network with precise analyses for how to spin the story.<sup>64</sup>

80. The Associational Defendants not only obtained and disseminated Hamas’ “Our Narrative” propaganda document, but painstakingly followed it. In doing so, they directly responded to, and followed orders from, Hamas, an FTO.

## V. THE NSJP TOOLKIT

81. On October 8, 2023, in direct response to Hamas’ “call for mass mobilization” issued immediately following its attack, AMP/NSJP disseminated the NSJP Toolkit to its chapters and affiliates, including upon information and belief Columbia SJP, Columbia JVP, and Within Our Lifetime.<sup>65</sup>

82. The NSJP Toolkit uses the euphemism “the resistance” and similar phrases to refer to Hamas and the other terror organizations working under its command:

Referred to as Operation *Towfan Al-Aqsa* (Al-Aqsa Flood), the resistance has taken occupation soldiers hostage, fired thousands of rockets, taken over Israeli military vehicles, and gained control over illegal Israeli settlements. In the West Bank, the Palestinian resistance has called for collective action by the Palestinian masses amidst attempts by the Zionist entity to lock-up the West Bank.

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<sup>62</sup> COALITION FOR A SAFER WEB, THE HAMAS “INFLUENCER” INTIFADA (NOV. 16, 2023) (“CSW Report”), <https://coalitionsw.org/the-hamas-influencer-intifada/>.

<sup>63</sup> IDF Editorial Team, *Hamas Social Media Rules: Describe Terrorists as Innocent Civilians*, ISRAEL DEFENSE FORCES (July 21, 2014), <https://www.idf.il/en/mini-sites/the-hamas-terrorist-organization/hamas-social-media-rules-describe-terrorists-as-innocent-civilians/>.

<sup>64</sup> <https://www.palestinechronicle.com/wp-content/uploads/2024/01/PDF.pdf>.

<sup>65</sup> The NSJP Toolkit is attached as Exhibit 1.

Today, we witness a historic win for the Palestinian resistance: across land, air, and sea, our people have broken down the artificial barriers of the Zionist entity . . . As the Palestinian student movement, we have an unshakable responsibility to join the call for mass mobilization.<sup>66</sup>

83. The NSJP Toolkit demands that its members, allies, and affiliates “not only support, but *struggle alongside our people back home ... and above all normalize and support our fearless resistance.*”<sup>67</sup> To do so, AMP/NSJP demand that their followers “normalize the resistance”— Hamas—by arguing that

*Liberation is not an abstract concept.* . . . [L]iberating colonized land is a real process that requires confrontation by *any means necessary*. In essence, decolonization is a *call to action* . . . It calls upon *us* to engage in meaningful actions that go beyond symbolism and rhetoric. Resistance comes in all forms—*armed struggle*, general strikes, and popular demonstrations. *All of it is legitimate, and all of it is necessary.* (emphases added)<sup>68</sup>

84. The NSJP Toolkit urges AMP/NSJP to provide “*real*” support to Hamas and their allies not just through arguments and rhetoric, but also through “confrontation” that can include, among other things, “armed struggle” and violence.

85. Then, AMP/NSJP describes the existence of a “Unity Intifada” that is “cross-factional” and operating “under unified command” in Gaza; the only entity operating any resemblance of a “unified command” of terrorist organizations in Gaza is Hamas.<sup>69</sup>

86. Rather than describe themselves as supportive of, affiliated with, or spiritually connected to Hamas’ Unity Intifada, AMP/NSJP identify themselves as “*PART of this movement [Hamas’ Unity Intifada], not in solidarity with this movement.*”<sup>70</sup>

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<sup>66</sup> *Id.* at 1.

<sup>67</sup> *Id.*

<sup>68</sup> *Id.* at 4; see also Sheera Frenkel & Steven Lee Myers, *Antisemitic and Anti-Muslim Hate Surges Across the Internet*, N.Y. TIMES (Nov. 15, 2023), <https://www.nytimes.com/2023/11/15/technology/hate-speech-israel-gaza-internet.html>.

<sup>69</sup> Ex. 1, at 4.

<sup>70</sup> *Id.*

87. Next, the NSJP Toolkit provides its chapters with graphics and marketing materials to advertise the “Day of Resistance” and other events. These graphics include, among many other violent images, artistic renderings of Hamas paragliders.<sup>71</sup> As discussed above, Hamas used paragliders for the very first time the day before to infiltrate Israel and murder innocent civilians at the Nova Music Festival.



88. Lastly, AMP/NSJP directed their chapters to endorse the “Towfan Al-Aqsa Statement.”<sup>72</sup> “Towfan Al-Aqsa” (“Al-Aqsa Flood”) was the codename for Hamas’ October 7 attack. The Towfan Al-Aqsa Statement was drafted by NSJP’s University of California at Berkeley chapter, Bears for Palestine, on behalf of the united coalition of Students for Justice in Palestine.”<sup>73</sup> It demands that AMP/NSJP chapters pledge loyalty to the cause: providing knowing and

<sup>71</sup> *Id.* at 5.

<sup>72</sup> The Towfan Al-Aqsa Statement is attached as **Exhibit 2**.

<sup>73</sup> *Id.*

substantial assistance to Hamas’ prior and ongoing acts of international terrorism. It requires chapters to declare their “unwavering support of the resistance in Gaza [Hamas].”<sup>74</sup>

89. The Towfan Al-Aqsa Statement declares support for the signatories’ “comrades in blood and arms”—a phrase from an FTO-affiliated Telegram channel called “Resistance News Network”—intended to refer to Hamas and its affiliates.<sup>75</sup> The Towfan Al-Aqsa Statement closes:

**We support the resistance [Hamas], we support the liberation movement, and we indisputably support the Uprising.**

Gaza is the cradle of our resistance and the lifeblood of our struggle. . . . From the River to the Sea, we will come to support resistance [Hamas] until we are able to return home to a unified Palestine. Glory to Palestine, glory to the resistance [Hamas], and glory to our martyrs.<sup>76</sup>

90. On information and belief, AMP/NSJP distributed the NSJP Toolkit to the Associational Defendants. The bases for that belief include the close connections among AMP/NSJP and Associational Defendants detailed above. More than that, the Associational Defendants promptly enacted the Toolkit to the letter.

91. As directed by the NSJP Toolkit, *Columbia SJP signed the Towfan Al-Aqsa Statement “in unison” with NSJP and Bears for Palestine*. A note at the bottom of the Towfan Al-Aqsa Statement confirms that the document was disseminated, drafted, and “signed in unison” by 83 signatories, including Columbia SJP, by October 7, 2023, at 3:00pm PST.<sup>77</sup> Thus, the Towfan

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<sup>74</sup> *Id.*

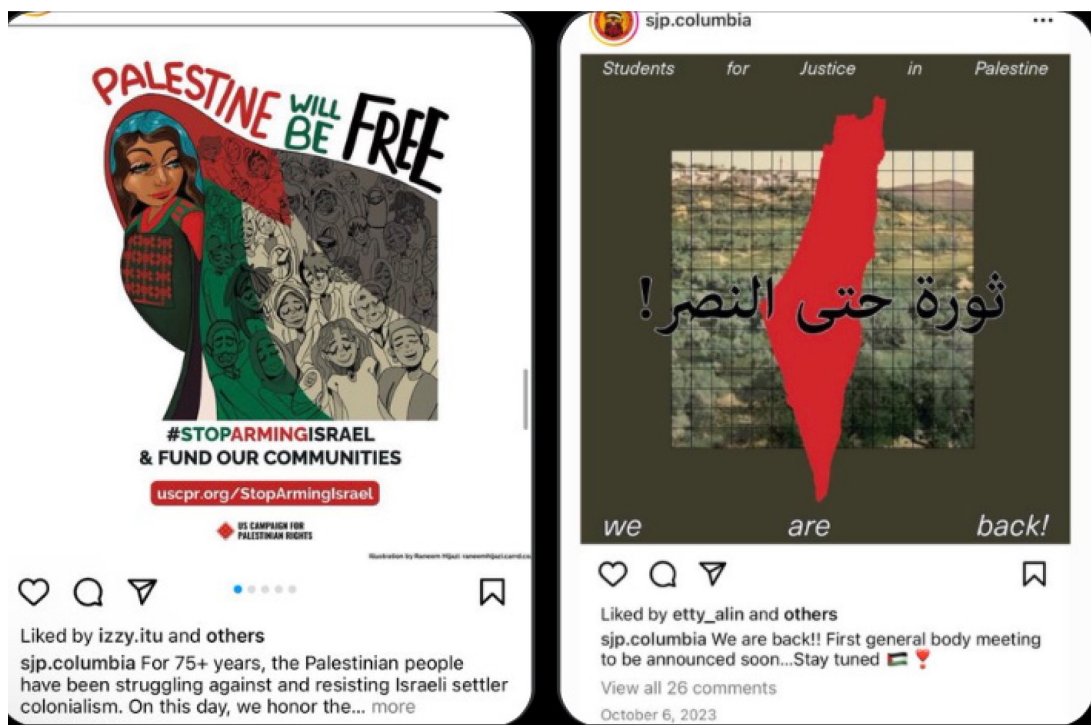
<sup>75</sup> *Id.* The Resistance News Network Telegram Chat is attached as **Exhibit 3**. Telegram is a communications platform with social media, direct messaging, and chatroom capabilities.

<sup>76</sup> Ex. 2.

<sup>77</sup> *Id.* (“Note: As of post October 7, 2023 at 3pm PST, if you/your organization wishes to sign on, please use this link to record your organization’s name as wished to appear in the signature list, and we will manually add it to the growing list. Thank you for your support and solidarity.”).

Al-Aqsa Statement was drafted, reviewed, and signed by more than 80 organizations before and/or during the events of October 7 themselves.<sup>78</sup>

92. On information and belief, Associational Defendants had prior knowledge of the October 7 attack. The bases for that belief include the timing of the NSJP Toolkit's distribution and the signing of the Towfan Al-Aqsa Statement. The bases also include the Toolkit's inclusion of paraglider graphics. And as to Columbia SJP, the bases also include a highly suggestive social media post published moments before the October 7 attack began. Three minutes before Hamas began its attack on October 7, Columbia SJP posted on Instagram "We are back!!" and announced its first meeting of the semester would be announced and that viewers should "Say tuned." Before the post, Columbia SJP's account had been dormant for months.



<sup>78</sup> See *id.*; Hamas's October 7 Massacre Reliving the Day, Hour by Hour, JERUSALEM POST (Oct. 7, 2024), <https://www.jpost.com/israel-hamas-war/article-823396>.

93. Like Columbia SJP, Within Our Lifetime promptly answered Hamas' call. It issued a statement on October 7 that it "support[s] Palestinian resistance in all its forms. By any means necessary. With no exceptions and no fine print."<sup>79</sup> Contemporaneously, before the NSJP Toolkit was even released, Kiswani, on behalf of Within Our Lifetime, called for an "Emergency Rally for Gaza" using the marketing materials that would not be released until the next day.<sup>80</sup>



NSJP Toolkit

<sup>79</sup> *Who Are the Primary Groups Behind the U.S. Anti-Israel Rallies?*, ANTI-DEFAMATION LEAGUE (last visited Mar. 23, 2025), <https://abcnews.go.com/International/hamas-day-rage-protests-break-middle-east/story?id=103955873>.

<sup>80</sup> Within Our Lifetime collaborated with Samidoun on the event. Samidoun was, at the time, identified by several other nations as a terrorist organization. The United States labeled Samidoun a terrorist organization on October 15, 2024. *United States and Canada Target Key International Fundraiser for Foreign Terrorist Organization PFLP*, U.S. DEP'T OF TREASURY (Oct. 15, 2024), <https://home.treasury.gov/news/press-releases/jy2646>.





Kiswani/ Within Our Lifetime Post – October 7, 2023

#### **VI. THE ASSOCIATIONAL DEFENDANTS ENACT THE NSJP TOOLKIT**

94. After receiving the NSJP Toolkit, the Associational Defendants promptly leapt into action to knowingly assist Hamas with the provision of pro-Hamas propaganda.

95. These actions, as described below, substantially assisted Hamas in its ability to engage in its post-October 7 acts of international terrorism by disseminating propaganda and espousing a worldview to an impressionable Western audience that may not understand the evil of Hamas and its intentions or recognize lies about the State of Israel.

### A. *The Fall 2023 Semester*

96. Immediately after its October 7 attack, Hamas called on its supporters to join in a “Day of Rage” scheduled for the next week.<sup>81</sup> In the NSJP Toolkit, AMP/NSJP called on their supporters to join in a “Day of Resistance” on the same day.<sup>82</sup>

97. Columbia SJP and Columbia JVP began promoting their “Day of Resistance” and Within Our Lifetime began promoting its “Day of Rage”<sup>83</sup> across New York City and on Columbia’s campus. These Days of Rage/Resistance have continued, unabated, for years.<sup>84</sup> The advertisements for these events included clear references to many materials produced and provided by AMP/NSJP and even Hamas itself.

98. Even before the Day of Rage/Resistance, its mere announcement had its intended effect. Jewish Day Schools and other Jewish institutions throughout the United States, including in New York City, shut their doors and New York City government, recognizing a legitimate potential threat to these institutions, emphasized that it would fully mobilize law enforcement to ensure the safety and security of Jewish New Yorkers.<sup>85</sup> The threat from the Day of Rage/Resistance even forced Columbia University—a non-Jewish institution—to close its campus as a safety precaution.<sup>86</sup> Jewish students at Columbia University and Barnard College were advised to lock their doors and remain inside for their own safety.<sup>87</sup>

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<sup>81</sup> Meredith Deliso, *Hamas ‘Day of Rage’ Protests Break Out in Middle East and Beyond*, ABC NEWS (Oct. 13, 2023), <https://abcnews.go.com/International/hamas-day-rage-protests-break-middle-east/story?id=103955873>.

<sup>82</sup> Ex. 1.

<sup>83</sup> Within Our Lifetime has used the “Day of Rage” language that Hamas uses since before October 7. *See, e.g.*, Within Our Lifetime (@WOLPalestine), X (Oct. 13, 2022, 2:27 PM).

<sup>84</sup> National Students for Justice in Palestine (@NationalSJP), X, (May 6, 2024, 12:23 AM), <https://x.com/NationalSJP/status/1787337411946561692>; Documenting Jew Hatred on Campus at Columbia U (@CampusJewHate), X, (June 9, 2024, 11:19 AM), <https://x.com/CampusJewHate/status/1799823595910127850>.

<sup>85</sup> Haley Cohen *et al.*, *Jewish Institutions on Edge After Hamas Call for Worldwide ‘Day of Rage’*, JEWISH INSIDER (Oct. 13, 2023), <https://jewishinsider.com/2023/10/hamas-day-of-rage-jewish-schools-synagogues-u-s/>.

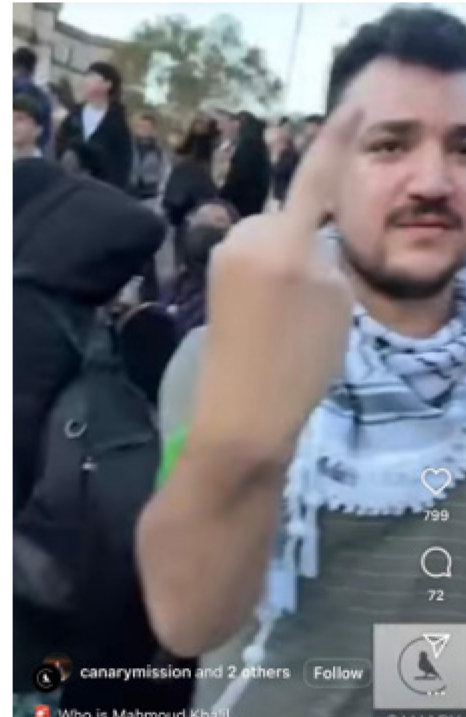
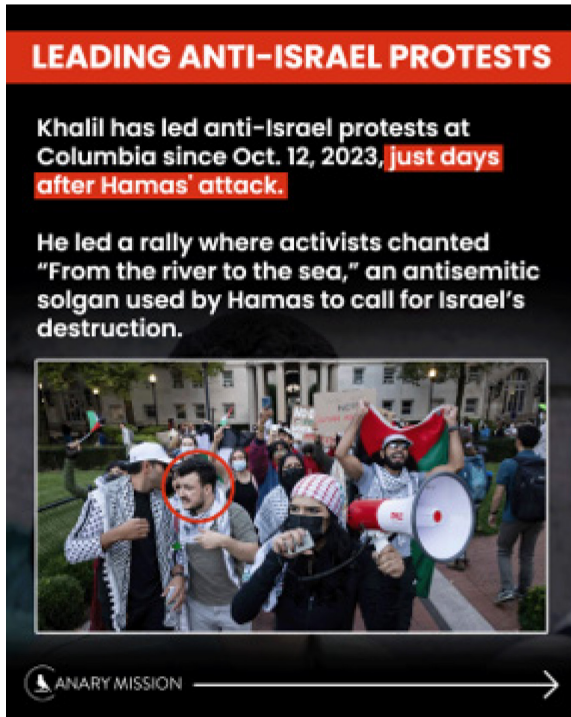
<sup>86</sup> Jocelyn Gecker, *et al.*, *The Israel-Hamas War Has Roiled US Campuses. Students on Each Side Say Colleges Aren’t Doing Enough*, ASSOCIATED PRESS (Oct. 15, 2023), <https://apnews.com/article/israel-hamas-war-college-free-speech-543aff623d5f54ad6529fe598ae48271>.

<sup>87</sup> <https://www.facebook.com/cbhillcl/posts/pfbid02rvwDFCdGb9VNFcuccUr5mCphhHm7dDwthBAkf43VpFr5ALTW9499erbcq3wQMYvsl>.



99. On October 9, 2023, Columbia SJP issued its own separate statement of “full solidarity” with the “Resistance” (Hamas).<sup>88</sup>

100. Columbia SJP and Within Our Lifetime’s Day of Rage/Resistance events were filled with the exact sort of hate, vitriol, and violent rhetoric that Hamas and AMP/NSJP demanded.<sup>89</sup> Khalil led Columbia SJP’s Day of Resistance.<sup>90</sup>



101. On October 29, 2023, Hamas applauded and celebrated “the masses who demonstrated in American cities and Western capitals in solidarity with Gaza,” many of which were orchestrated, planned, coordinated, and implemented by Associational Defendants.<sup>91</sup> Hamas

<sup>88</sup> Columbia SJP (@sjp.columbia), INSTAGRAM (Oct. 9, 2023) (Post Deleted).

<sup>89</sup> *US Campuses in Uproar as Israel-Palestine Conflict Exposes Divide*, THE GUARDIAN (Oct. 13, 2023), <https://www.theguardian.com/world/2023/oct/13/us-campuses-in-uproar-as-israel-palestine-conflict-exposes-divide>

<sup>90</sup> Canary Mission (@CanaryMission), X (Mar. 13, 2025, 11:16 AM), <https://x.com/canarymission/status/1900204396681535501>.

<sup>91</sup> Mario Nawfal (@MarioNawfal), X (formerly Twitter) (Oct. 29, 2023, 2:06 PM), <https://twitter.com/MarioNawfal/status/1718690673749103082>.

also called on its followers to “continue their movement in solidarity with the Gaza Strip and in support of the justice of our national cause, and to escalate all forms of popular pressure.”

102. On October 30, 2023, Hamas, the PFLP, and several other FTOs put out a new call for the “masses of our people throughout occupied Palestine to escalate all forms of resistance and struggle against the Zionist enemy, targeting its soldiers and settlers.”<sup>92</sup> At the same time, they addressed their supporters abroad and called for “the free people of the world to continue their movements to stop the American-Zionist aggression.”<sup>93</sup>

103. The next day, NSJP responded by advertising a “Week of Action for Gaza.” Columbia SJP and Columbia JVP participated in the Week of Action for Gaza.<sup>94</sup>

104. On November 5, 2023, PFLP, a Hamas-affiliated FTO, called on supporters “to continue the unprecedented mass mobilizations in the capitals and cities of the world, especially in the United States, Britain, France and Berlin . . . . These have proven their effectiveness and strong impact, and what we are witnessing of changes in the official Western discourse indicates the strength and impact of this pressure and confirms that we are facing important transformations in public opinion.”<sup>95</sup>

105. The same day, AMP/NSJP announced a “Shut it Down for Palestine” campaign scheduled to begin on November 9, 2023. Columbia SJP, Columbia JVP, and CUAD organized a

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<sup>92</sup> *Democratic Front for the Liberation of Palestine, Hamas (Islamic Resistance Movement), Palestinian Islamic Jihad, Popular Front for the Liberation of Palestine, and Popular Front for the Liberation of Palestine – General Command, Palestinian joint statement: ‘Escalate all forms of resistance,’ International Action Center*, INTERNATIONAL ACTION CENTER (Oct. 30, 2023) <https://iacenter.org/2023/10/31/palestinian-joint-statement-escalate-all-forms-of-resistance/>.

<sup>93</sup> *Id.*

<sup>94</sup> National SJP (@nationalsjp), INSTAGRAM (OCT. 31, 2023), [https://www.instagram.com/p/CzENKGiLKdO/?img\\_index=1](https://www.instagram.com/p/CzENKGiLKdO/?img_index=1).

<sup>95</sup> *Popular Front for the Liberation of Palestine, Popular Front for the Liberation of Palestine: ‘We are on the threshold of achieving a historic victory,’* INTERNATIONAL ACTION CENTER (released on Nov. 5, 2024), <https://iacenter.org/2023/11/10/popular-front-for-the-liberation-of-palestine-we-are-on-the-threshold-of-achieving-a-historic-victory/>.

“Shut it Down for Palestine” event.<sup>96</sup> Columbia SJP advertised the campaign and the even on its Instagram account, directing students to gather at Columbia’s Low Library.

106. The “Shut it Down for Palestine” event descended into—as planned—anti-Jewish and vitriolic hatred and threats. At the rally, speakers shouted for “Death to Jews!” and other hateful rhetoric and encouraged Hamas and AMP/NSJP’s comrades across Columbia’s campus to hunt down and assault pro-Israel Columbia students. The next day, November 10, 2023, Columbia suspended Columbia SJP and Columbia JVP for, among other things, “threatening rhetoric and intimidation.”<sup>97</sup>

107. After their suspension, Columbia SJP and Columbia JVP continue to operate through the CUAD name.<sup>98</sup> Khalil and former members and/or organizers of Columbia SJP became leaders of CUAD. Over 80 of CUAD signatory chapters have continued with the CUAD Coalition to allow Columbia SJP and Columbia JVP to continue operating despite their suspension.<sup>99</sup>

108. CUAD first posted to Instagram on November 27, 2023, just two weeks after Columbia SJP was suspended. While Columbia SJP continued to hold unsanctioned events and rally its supporters through social media, CUAD became Columbia SJP’s new mouthpiece to spout Hamas propaganda on Columbia’s campus. Along with Within Our Lifetime, CUAD became the

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<sup>96</sup> Columbia Law Coalition for a Free Palestine (@clsforfreepalestine), INSTAGRAM (Nov. 9, 2023) (reposting flyer created by CUAD), <https://www.instagram.com/clsforfreepalestine/p/CzalpLGgyTZ/?locale=nl&hl=ar>.

<sup>97</sup> Statement from Gerald Rosberg, Chair of the Special Committee on Campus Safety, COLUMBIA NEWS (Nov. 20, 2023), <https://news.columbia.edu/news/statement-gerald-rosberg-chair-special-committee-campus-safety>.

<sup>98</sup> Luke Tress, *Columbia Student Group Retracts Apology of Member Who Said ‘Zionists Deserve to Die,’* THE TIMES OF ISRAEL (Oct. 9, 2024), <https://www.timesofisrael.com/columbia-student-group-retracts-apology-of-member-who-said-zionists-deserve-to-die/>.

<sup>99</sup> Chris Mendell and Gelila Negesse, *Over 80 Student Groups Form Coalition Following Suspension of SJP, JVP*, COLUMBIA SPECTATOR, (Dec. 6, 2024), <https://www.columbiaspectator.com/news/2023/11/29/over-80-student-groups-form-coalition-following-suspension-of-sjp-jvp/>.

primary organizer of the violent and antisemitic protests that would foment terror, sow discord, and disrupt campus life at Columbia for over a year.

109. When this transition occurred, CUAD expressed the same affiliation and fealty to AMP/NSJP that had previously been exhibited by Columbia SJP. CUAD began sending representatives to NSJP events. At a virtual NSJP event titled “Want to Build a Coalition” on December 7, 2023, Alwan, identifying herself as “Maryam (Columbia SJP, She/Her)” stated that operating under CUAD’s banner allowed NSJP’s agents and activists on Columbia’s campus to be *more openly radical*.<sup>100</sup>

110. On December 10, 2023, Hamas announced that “We commend the global movement advocating for a comprehensive strike, tomorrow, Monday, December 11, 2023. We invite all the free people of the world to participate widely in it . . . . We also call for the continuation and escalation of all forms of mass marches and public demonstrations, in cities, capitals, and squares around the world, condemning the American support...”<sup>101</sup> That day, NSJP posted a call for its followers to participate in a global strike for Palestine on December 11, 2023—just like Hamas had asked them to.<sup>102</sup> Columbia SJP and Columbia JVP similarly heeded Hamas’ call and, despite their suspension from campus, organized a rally in front of Barnard and in front of Low Library.<sup>103</sup>

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<sup>100</sup> Stu (@stustustudio), X (Dec. 7, 2023), <https://x.com/thestustustudio/status/1732985031218336058?s=46>.

<sup>101</sup> Hamas, *Monday, Dec. 11 global #StrikeForGaza*, INTERNATIONAL ACTION CENTER (Dec. 10, 2023), <https://iacenter.org/2023/12/10/monday-dec-11-global-strikeforgaza/>.

<sup>102</sup> National SJP (@nationalsjp), INSTAGRAM, <https://www.instagram.com/nationalsjp/p/C0sKjv1O0o-/> (last visited Mar. 23, 2025).

<sup>103</sup> Chris Mendell, *SJP and JVP Protest on Barnard’s Campus to Demand Permanent Ceasefire*, COLUMBIA SPECTATOR (Dec. 12, 2023), <https://www.columbiaspectator.com/news/2023/12/11/sjp-and-jvp-protest-on-barnards-campus-to-demand-permanent-ceasefire/>; *Columbia SJP*, CANARY MISSION (last visited Mar. 23, 2025), [https://canarymission.org/chapter/Columbia\\_SJP](https://canarymission.org/chapter/Columbia_SJP).

111. Throughout the rest of the Fall 2023 Semester, the Associational Defendants regularly, routinely, and consistently followed the orders of Hamas, whether given directly or through intermediaries such as PFLP or AMP/NSJP.

***B. The Spring 2024 Semester: Escalation***

112. On January 21, 2024, Khaled Mashal—the former founder of IAP, AMP/NSJP’s predecessor in Hamas’ American material support enterprise—applauded the Associational Defendants’ work as propagandists and foot soldiers for the Hamas cause. Mashal made clear that the support of its allies in the United States was fundamental to Hamas’ ability to pursue its goals.<sup>104</sup> In other words, Hamas acknowledged that the assistance that AMP/NSJP and the Associational Defendants knowingly provided to Hamas was substantial in aiding Hamas to continue its acts of international terrorism in pursuit of destroying the State of Israel.

113. With this backdrop, Associational Defendants escalated their conduct, hosting individuals affiliated with sanctioned terrorist groups on campus. On March 24, 2024, CUAD, Within Our Lifetime, and Samidoun (which would be designated an FTO approximately six months later) hosted an event called “Resistance 101.”

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<sup>104</sup> *Hamas Leader Abroad Khaled Mashal: ‘We Reject The Two-State Solution; October 7 Proved That Liberating Palestine From The River To The Sea Is Realistic And Has Already Begun’*, MEMRI TV (Jan. 22, 2024), <https://www.memri.org/reports/hamas-leader-abroad-khaled-mashal-we-reject-two-state-solution-october-7-proved-liberating>.



114. Though Columbia barred the event from taking place, CUAD and Within Our Lifetime proceeded with it anyway. The speakers included (i) Khaled Bakarar, a PFLP terrorist;<sup>105</sup> (ii) Charlotte Kates, Barakat’s wife and a leader of Samidoun;<sup>106</sup> and (iii) Sean Eren, a member of the NSJP Steering Committee.

115. Eren, speaking on behalf of NSJP, lamented that he and his friends must worry about being jailed if they so much as contact members of Hamas. He explained that the threat of this scenario constantly looms before them.

116. Barakat told the Associational Defendants, that *when he speaks with his “friends and brothers in Hamas, the PIJ, the PFLP” and other terrorist organizations operating in Gaza, he learns that the terrorists care more about the support they receive from American students protesting on their behalf than they do about what the President or Vice President of the United*

<sup>105</sup> Khaled Barakat, CANARY MISSION, (last visited Mar. 23, 2025), [https://canarymission.org/individual/Khaled\\_Barakat](https://canarymission.org/individual/Khaled_Barakat).

<sup>106</sup> Charlotte Kates, CANARY MISSION, (last visited Mar. 23, 2025), [https://canarymission.org/individual/Charlotte\\_Kates](https://canarymission.org/individual/Charlotte_Kates).



*States says or does.* Barakat told the group, led by Associational Defendants—per his “friends and brothers” in Hamas, the PFLP, and others—that every demonstration American students do matters and that their “work” is more important than ever.

117. Kates explained that it was important for everyone to support Hamas because Hamas terrorists took the necessary actions (*i.e.*, raping, murdering, dismembering, and kidnapping innocent men, women, and children) to liberate Palestine. In the words of Kates, “There is nothing wrong with being a member of Hamas, being a leader of Hamas, being a fighter in Hamas, these are the people that are on the front lines defending Palestine and fighting for its liberation.” Kates encouraged the audience to fight alongside Hamas.

118. Six days later, on March 30, 2024, Barakat gave another interview with Al-Manat TV (Hizbullah-Lebanon) in which he explained that the protesters in the West, with their chants to “Free Palestine from the River to the Sea,” are providing popular, political, and media support for the armed resistance.<sup>107</sup>

### ***C. The Gaza Solidarity Encampment***

119. Against the backdrop of the severe disruptions describe above, the U.S. House of Representatives subpoenaed Columbia administrators to testify regarding virulent campus antisemitism. The testimony was scheduled for April 17, 2024.

120. On the day of testimony, Associational Defendants launched the so-called “Gaza Solidarity Encampment” (“Encampment”). The Encampment was designed to disrupt campus activities, terrorize Jewish students, prevent Jewish students who refused to disavow Israel from

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<sup>107</sup> *Canada-Based Former Senior PFLP Official Khaled Barakat On Hizbullah TV: American And Canadian Protesters Support Armed Resistance, Elimination Of Israel; BDS Serves The Armed Resistance, But Cannot Substitute It*, MEMRI TV (Apr. 5, 2024), <https://www.memri.org/reports/canada-based-former-senior-pflp-official-khaled-barakat-hizbullah-tv-american-and-canadian>.

fully accessing campus, and encourage other AMP/NSJP affiliates to similarly takeover their own campuses and sow chaos in support of Hamas.<sup>108</sup>

121. The Encampment was well-supplied with identical tents, toiletries, food, and professional signage. Upon information and belief, and based upon statements made to Plaintiff Shlomi Ziv by his Hamas captor, Hamas and AMP/NSJP provided financial, organizational, and other support to CUAD and the Columbia AMP/NSJP Affiliates for the Encampment.

122. The Encampment was not a spontaneous act of civil disobedience by misguided but well-meaning students. Rather, this was an effort by a FTO to sponsor, plan, and organize and significant disruption of one of America's most important academic centers to support its terrorist aims. The Associational Defendants acted as Hamas' foot soldiers in New York City and on Columbia's campus and enacted Hamas and AMP/NSJP's plan to disrupt Columbia's operations to assist Hamas.

123. Columbia tried to end the Encampment. Khalil acted as the Encampment's lead negotiator.<sup>109</sup>

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<sup>108</sup> Kanishka Singh, *Over 100 pro-Palestinian protesters arrested from New York's Columbia campus*, REUTERS (Apr. 19, 2024), <https://www.reuters.com/world/us/over-100-pro-palestinian-protesters-arrested-new-yorks-columbia-campus-2024-04-19/>.

<sup>109</sup> Canary Mission (@canarymission), X (Mar. 13, 2025 11:16 AM), <https://x.com/canarymission/status/1900204396681535501>.





124. On April 18, 2024, Within Our Lifetime directed non-students to descend on the Encampment and show their support. This, ultimately, forced Columbia to ask the New York Police Department to enter campus and clear the Encampment. The NYPD arrested more than 100 pro-Hamas activists.<sup>110</sup> Alwan was among those arrested at the Encampment.<sup>111</sup>

125. Meanwhile, Within Our Lifetime continued its regular riots and calls for indiscriminate violence against civilians. One masked Hamas supporter, draped in a Palestinian flag, shouted, “Never forget the 7th of October! Are you ready? 7th of October is about to be every day. Every day. 7th of October is going to be every day for you!”<sup>112</sup>

126. The next day, in response to the clearing of the Encampment, NSJP posted:

TO ALL CHAPTERS: THIS IS A CALL TO ACTION!

<sup>110</sup> Dion Pierre, *Ilhan Omar Silent After Daughter's Arrest, Suspension for Role in Columbia University Anti-Israel Protest*, THE ALGEMEINER (Apr. 19, 2024) <https://www.algemeiner.com/2024/04/19/ilhan-omar-silent-daughters-arrest-suspension-role-columbia-university-anti-israel-protest/>.

<sup>111</sup> Columbia SJP (@ColumbiaSJP), X (Apr. 19, 2024) (“An SJP Organizer, Maryam Alwan, smiling in the face of arrest.”), <https://x.com/ColumbiaSJP/status/1781412022594236511>.

<sup>112</sup> Michael Starr, *‘October 7 is about to be every day’: Columbia rally sees Hamas support*, JERUSALEM POST (Apr. 21, 2024), <https://www.jpost.com/diaspora/antisemitism/article-798049>.

Our universities have chosen profit and reputation over the lives of the people of Palestine and the will of their students. [Columbia] President Minouche Shafik's cowardly testimony to Congress heralds an unfortunate shift: university administrators have capitulated to the pressure of the Zionist lobby and allied Right Wing, selling out the Student Movement for Palestinian liberation to save face in the eye of the state.

We know, however, that the supposed power of these administrators pales in comparison to the combined strength of the students, staff, and faculty committed to realizing justice and upholding Palestinian liberation on campus. In the footsteps of our comrades at Rutgers-New Brunswick SJP, Tufts SJP, and now Columbia SJP, we call on all SJPs across the nation to take back the university and force the administration to divest for the people of Gaza!

BE READY FOR AN INTERNAL CALL FOR IMMEDIATE NEXT ACTION ITEMS! REPOST ON YOUR SOCIALS TO CIRCULATE THIS NATIONAL CALL TO ACTION.<sup>113</sup>

127. The next day, on April 20, 2024, NSJP used the Associational Defendants' actions on Columbia's campus to launch a new project: Popular University for Gaza.

PS WE ARE ALL SJP! PS Our universities have chosen profit and reputation over the lives of the Palestine and our will as students. The supposed power of our administrators is nothing compared the strength of the united students, staff, and faculty committed to realizing justice and upholding Palestinian liberation on campus. In the footsteps of our comrades, at Rutgers-New Brunswick SJP, Tufts SJP, and now Columbia SJP, we will seize our universities and force the administration to divest, for the people of Gaza! Join the Popular University, take back our institutions!<sup>114</sup>

128. With NSJP's support, despite the NYPD's intervention, the Encampment continued. Indeed, its extremism escalated. In the days that followed, the Encampment became even more openly affiliated with Hamas and expressly invoked groups such as the "Al-Qassam Brigades," the militant terrorist wing of the Hamas organization. In fact, Encampment comrades

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<sup>113</sup> National SJP (@nationalsjp), INSTAGRAM (Apr. 19, 2024), <https://www.instagram.com/p/C580sAZONce/?igsh=MzRIODBiNWFlZA%3D%3D>.

<sup>114</sup> National SJP (@nationalsjp), INSTAGRAM (Apr. 20, 2024), [https://www.instagram.com/p/C5\\_GEIWuo0D/](https://www.instagram.com/p/C5_GEIWuo0D/).

identified Jewish Columbia students as “Al-Qassam’s Next Target.”<sup>115</sup> Encampment Leaders stated:

the Al-Aqsa Flood [the October 7 terrorist attack] that put the Global Intifada back on the table again. And it is the sacrificial spirit of the Palestinian Freedom Fights [Hamas] that will guide every struggle on every corner of the earth to victory. . . . Remember that Militancy breeds Resistance. Thousands upon thousands of students around the world have been moved to rebel because of your militancy.<sup>116</sup>

129. In response to the growing threats to Jewish students on Columbia’s campus, Hillel Rabbi Eli Beuchler, the Director of the Orthodox Union-Jewish Learning Initiative and Columbia and Barnard, issued the following message to students:

What we are witnessing in and around campus is terrible and tragic. The events of the last few days, especially last night, have made it clear that Columbia University’s Public Safety and the NYPD cannot guarantee Jewish students’ safety in the face of extreme antisemitism and anarchy.

It deeply pains me to say that I would strongly recommend you return home as soon as possible and remain home until the reality in and around campus has dramatically improved.

***It is not our job as Jews to ensure our own safety on campus.*** No one should have to endure this level of hatred, let alone at school.

If you need assistance, please reach out to me.

May we see better days on campus soon.

130. Some Jewish students, fearing for their safety, requested permission to attend class remotely.<sup>117</sup>

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<sup>115</sup> Michael Starr, ‘Burn Tel Aviv to the Ground:’ Calls for Violence Continue at Columbia, THE JERUSALEM POST (Apr. 21, 2024), [https://www.jpost.com/diaspora/antisemitism/article-798160#google\\_vignette](https://www.jpost.com/diaspora/antisemitism/article-798160#google_vignette).

<sup>116</sup> *Id.*

<sup>117</sup> Cayla Bamberger, *Jewish students at Columbia University ask to study remotely as pro-Palestinian demonstrations continue*, N.Y. DAILY NEWS (Apr. 19, 2024), <https://www.nydailynews.com/2024/04/19/students-at-columbia-university-continue-pro-palestinian-demonstration-day-after-mass-arrests/>.

131. The Encampment was attended by high-profile guests and characterized by publicity stunts. Senior members of AMP/NSJP, including Osama Abuirshaid, attended the Encampment,<sup>118</sup> as did family members and representatives of individuals convicted of provided material support of Hamas-linked FTOs such as Palestinian Islamic Jihad.<sup>119</sup> Kiswani celebrated her wedding in the Encampment.<sup>120</sup>

132. On April 29, 2024, Associational Defendants' mob seized Hamilton Hall, an academic building at Columbia University. They barricaded the doors, blocked entrances, smashes windows, zip-tied the doors shut, and even took janitorial staff hostage.<sup>121</sup> Associational Defendants' unlawful trespass and hostage taking prompted the New York City Police Department to sweep the building. NSJP live streamed the Hamilton Hall takeover and subsequent arrests on Instagram. One live stream was captioned, "STUDENT INTIFADA AT COLUMBIA WHERE STUDENTS HAVE OCCUPIED HAMILTON HALL."



<sup>118</sup> American Muslims for Palestine (@ampelstine), INSTAGRAM (Apr. 25, 2024), <https://www.instagram.com/ampalestine/reel/C6Ky7Q7rL3x>.

<sup>119</sup> Joe Marino, et al., *Wife of Convicted Terrorist Sami Al-Arian Was Hanging Out at Columbia Encampment Before Dramatic Raid*, NEW YORK POST (May 1, 2024), <https://nypost.com/2024/05/01/us-news/wife-of-convicted-terrorist-was-at-columbia-encampment-before-raid/>.

<sup>120</sup> Shai Davidai (@SaiDavidai), X (Apr. 24, 2024, 1:36 AM), <https://x.com/ShaiDavidai/status/1783007102752936099>.

<sup>121</sup> Aviva Klompas (@AvivaKlompas), X (Apr. 30, 2024, 7:15 AM), <https://twitter.com/AvivaKlompas/status/1785266759366226128>.

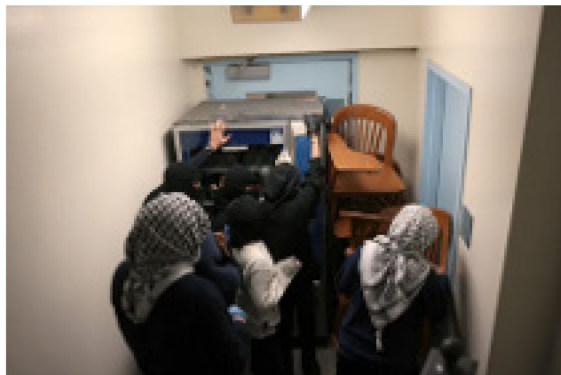
*Columbia SJP rioters breaking into Hamilton Hall.*<sup>122</sup>



*Columbia SJP rioter smashing a door at Hamilton Hall.*<sup>123</sup>



*Columbia SJP rioters barricading a door at Hamilton Hall.*<sup>124</sup>



*Columbia SJP rioters barricading another door at Hamilton*<sup>125</sup>

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<sup>122</sup> Alex Kent & Matt Stieb, *Behind the Barricades at Columbia's Hamilton Hall Takeover*, N.Y. MAGAZINE (updated May 1, 2024), <https://nymag.com/intelligencer/article/columbias-hamilton-hall-takeover-photos-from-inside.html>.

<sup>123</sup> *Id.*

<sup>124</sup> *Id.*

<sup>125</sup> *Id.*

133. One hundred and nine individuals were arrested for crimes committed at the encampment ranging from second degree assault, criminal possession of a weapon, burglary, and reckless endangerment.<sup>126</sup>

134. After Columbia ultimately dismantled the Encampment, the Associational Defendants received heaps of praise from FTOs and nation-state proxies including the Islamic Republic of Iran, the PFLP, Al-Qaeda, and Hezbollah issued statements supporting Associational Defendants and student efforts to support their terrorist allies, like Hamas.<sup>127</sup>

135. On May 10, 2024, at an event that including Hamas, PFLP, and PIJ leadership, PFLP Deputy Secretary-General Jamil Mezher praised the “university intifada,” urged its expansion, and called them “a model to be emulated in order to triumph for Palestine and its people.”

136. On May 31, 2024, Hassan Nasrallah, the Secretary General of Hezbollah (an Iranian-funded and supported terrorist organization based in southern Lebanon), echoed the sentiment, recognizing and lauding American students for their membership in the “resistance axis.” On June 11, Hezbollah MP Mohammad Raad, the leader of Hezbollah’s Loyalty to the Resistance parliamentary bloc said that Hezbollah should “invest” in these students.<sup>128</sup> Columbia SJP later reposted a video of Nasrallah glorifying martyrdom on Telegram, seemingly lamenting Israel’s elimination of an FTO leader.

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<sup>126</sup> JB Nicholas, *Complete List and Profiles of All Protesters Arrested Inside Hamilton Hall at Columbia University*, THE FREELANCE (last visited Mar. 23, 2025), <https://www.thefreelancenews.org/israel-palestine/complete-list-amp-profiles-of-all-protesters-arstd-inside-hamilton-hall-columbia-university-j6fnp?format=amp>.

<sup>127</sup> See *Composite Exhibit 4*.

<sup>128</sup> *Hizbullah Official Mohammad Raad: We Should Invest in the Pro-Palestine Student Protesters in Western Universities in Order to Enter the Heart of Western Societies*, MEMRI TV (June 20, 2024), <https://www.memri.org/reports/hizbullah-official-mohammad-raad-we-should-invest-pro-palestine-student-protesters-western-0>.



137. On January 15, 2025, the Resistance News Network shared a Telegram post quoting a speech by Hamas Political Bureau member and head of Hamas in Gaza Dr. Khalil al-Hayya, which stated, “We thank everyone who supported us with words, pens, voices, images, marches, demonstrations . . . .” The word “demonstrations” linked to an April 29 Telegram post: “Inspired by the example Columbia University students set with their Gaza Solidarity Encampment beginning April 17, campus organizations across the world have followed suit.”<sup>129</sup>

***D. The Associational Defendants’ Post-Encampment Activity***

138. Columbia SJP further amplified their efforts and messaging through their association with CUAD.

139. Columbia SJP continued to post pro-Hamas propaganda and repeat Hamas’ rhetoric on its social media.<sup>130</sup> For instance, on May 27, 2024, Columbia SJP—and SJP leaders at Harvard, Princeton, Yale, and the University of Pennsylvania—released the same message on their respective Instagrams, in both English and Arabic, calling for “an open intifada in every capital and every city.” Columbia SJP’s post has since been deleted. It read:

Escalate disruption and confrontation across historic Palestine, from every checkpoint and street corner to the face of every settler and soldier. Escalate protests to an open intifada in every capital and city in order to deprive the world from[sic] its heavy slumber that comes at the expense of the bodies and remains of those who survive; disrupt all facets of daily life until our people can breathe freely without the taint of the Israeli, American, and European war machine.

140. Columbia SJP uses Telegram as its chief medium to spread Hamas’ message. On or around May 29, 2024, Columbia SJP posted a message on its Telegram group from the Resistance News Network (an FTO-affiliated Telegram chat) which provided a “guide on the different factions

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<sup>129</sup> Ex. 3.

<sup>130</sup> Ahmed Fouad Alkhatib (@afalkhatib), X (May 10, 2024, 2:56 AM), <https://x.com/afalkhatib/status/1788825504264695935>.

of the Palestinian resistance.” The message continued, “What one must understand is the Palestinian resistance is not isolated to one religion or ideology, nor is it only comprised of the Islamic Resistance Movement Hamas. Educate yourself and render yourself immune to Zionist propaganda.” The message included a graphic describing an array of jihadist factions, including the designated FTO Al-Aqsa Martyrs Brigade, operating within both the West Bank and Gaza.

141. At the end of May 2024, Columbia SJP circulated a message from Resistance Archives, another FTO-affiliated Telegram network, glorifying Hamas terrorists. The post included a propaganda video of Hamas terrorists with the message: “These men will never be defeated.”<sup>131</sup>

142. On June 2, 2024, Columbia SJP posted a series of pro-terror messages on its Instagram account—material that has since been deleted. It read:

- a. “WE WILL BE BACK, INSTALLATION 1, COMPLETE”
- b. “WE KNOW THAT OUR MOVEMENT IS NOT CONFINED TO ONE BUILDING OR ONE LAWN, BUT RATHER, WE KNOW THE PEOPLE OF GAZA ARE THE LIFEBLOOD OF OUR STRUGGLE AND *THAT THEY HAVE SPARKED THE STUDENT INTIFADA*”
- c. “*WE RECOMMIT TO CONTINUE STRATEGIC, TARGETED ATTACKS ON ALL ASPECTS OF UNIVERSITY LIFE*”
- d. “WE ASK THAT STUDENTS ACROSS THE GLOBE PLEDGE TO DISRUPT ALL ASPECTS OF UNIVERSITY LIFE”
- e. “AS WE BEGIN OUR SUMMER OF DISRUPTION, WE ASK THAT EVERY STUDENT, AND OUR WIDER COMMUNITY, *DOES THE SAME*. USE THIS TIME TO *AGITATE, EDUCATE, AND ESCALATE*”
- f. “UNTIL VICTORY AND WITH MORE INSTALLATIONS TO COME, REVOLT FOR RAFAH-LONG LIVE THE STUDENT INTIFADA.”

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<sup>131</sup> *A Review of Columbia University’s Pro-Terror Group Students for Justice in Palestine (SJP)’s Encrypted Telegram Channel, Where it Openly Celebrates the ‘Strategic and Anti-Imperialist Al-Aqsa Flood’ of October 7, 2023, Valorizes Terror Organizations, ‘Martyred’ Hamas Leader Sinwar, Hizbullah’s Nasrallah*, MEMRI (JAN. 17, 2025), <https://www.memri.org/reports/review-columbia-universitys-pro-terror-group-students-justice-palestine-sjps-encrypted>.



143. In June 2024, CUAD publicly called on its followers to replicate October 7 on American soil, specifically guiding CUAD members to “look to the tactics” of the “Palestinian resistance for inspired actions,” and instructed them to “rise” “like a flood.”<sup>132</sup> Indeed, CUAD encouraged its followers to emulate specific historical terrorist acts, including an attempted firebombing of a federal building in Oakland, California done in response to the San Francisco Police Department’s response to an illegal encampment in a federal building. CUAD also referenced the “Week of Action: Operation Campus Flood” at the University of California, Berkeley, where “resistors” had successfully firebombed a UC Berkeley police car, torched a campus building, looted a campus supply building, and set fire to a construction site on campus. Each of these actions was framed by CUAD as part of the inspiration to be drawn from the October 7 attacks, which they had explicitly referenced as a model for their followers to follow.

144. The same day, CUAD posted a video on its Instagram depicting a “press conference” in front of the Manhattan criminal court building. In this video, CUAD leaders request the dismissal of criminal charges against a series of their affiliates who were arrested during the April 2024 Hamilton Hall takeover. About two minutes into the video, the leader of the press conference references terrorists convicted as part of the Holy Land Foundation and asks to “free them all.”<sup>133</sup>

145. On August 8, 2024, CUAD made a public declaration via Instagram in a post that has since been deleted, stating: “We are Westerners fighting for the total eradication of Western Civilization . . . we seek community and instruction from militants in the Global South[.]”

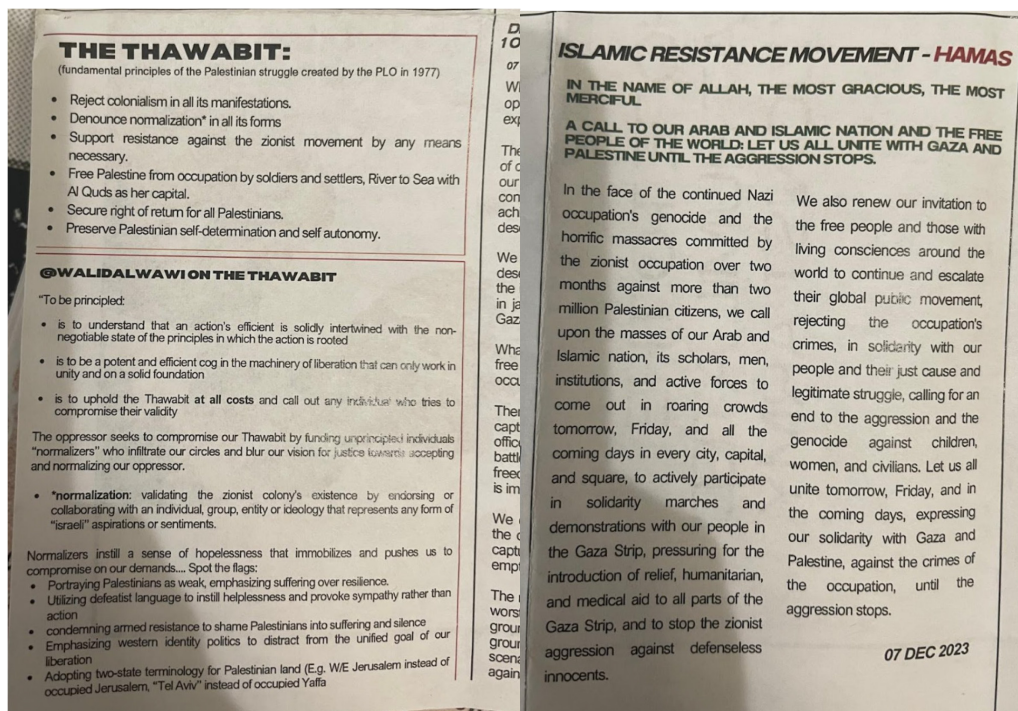
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<sup>132</sup> Columbia University Apartheid Divest (@cuapartheiddivest), INSTAGRAM (June 20, 2024), [https://www.instagram.com/cuapartheiddivest/p/C8cjXIkN4YI/?img\\_index=7](https://www.instagram.com/cuapartheiddivest/p/C8cjXIkN4YI/?img_index=7).

<sup>133</sup> Columbia University Apartheid Divest (@cuapartheiddivest), INSTAGRAM (June 20, 2024), <https://www.instagram.com/reel/C8c8QDoNSz3/?igsh=MWFzZW10bm53cjh4OQ%3D%3D>.

146. Additionally, CUAD declared that those fighting for resistance in America must face extreme consequences—namely, being “killed, jailed, tortured and targeted”—in order to “genuinely threaten the state” as part of the Global Intifada.

147. On September 24, 2024, CUAD hosted a “Study In4Palestine” at Columbia’s Butler Library to demand Columbia’s divestment from Israel. The advertisement for this event was circulated on the Instagram accounts for CUAD and Columbia JVP. The next day, individuals at the Study In4Palestine event distributed terrorist propaganda material, depicted below. The Associational Defendants have repeatedly spread the same pro-Hamas propaganda.



149. On September 29, 2024, two days after the death of Hezbollah leader Hassan Nasrallah, the Columbia SJP Telegram account posted one of Nasrallah's speeches, and the following caption:

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150. On October 7, 2024, CUAD marked the anniversary of the October 7 attacks by distributing a self-published newspaper featuring the headline “One Year Since Al-Aqsa Flood, Revolution Until Victory” above an image of Hamas terrorists breaching the security fence into Israel. The newspaper also included an essay that described the October 7 attacks as a “moral, military and political victory.”

151. That same day, on Columbia SJP’s group chat, they distributed talking points from Ismael Haniyeh, the former chairman of the Hamas Political Bureau. The talking points simultaneously valorized October 7—the massacres of innocents, the rapes, the kidnappings—as a “moral, military, and political victory” and celebrated the so-called “mobilization and unity of the world’s masses.” That is the very service Associational Defendants provide to Hamas.

152. On October 8, 2024, CUAD and Columbia JVP posted, “A Letter from CUAD Leadership to Khymani James and Our Comrades in Solidarity” on a CUAD Instagram account that, on information and belief, is operated by Defendant Khalil. James, a former CUAD spokesperson, had recorded a video starting that “Zionists don’t deserve to live” and that others should “Be grateful that I’m not just going out and murdering Zionists” during a meeting with school disciplinary officials. CUAD first attempted to distance itself from James’ statement, issuing what it describes as an apology on his behalf. But on October 8, 2024, CUAD retracted its apology, stating: “We support liberation by any means necessary, including armed resistance . . . violence is the only path forward . . . Long live Palestine, long live the Intifada, and long live the Resistance.”<sup>134</sup>

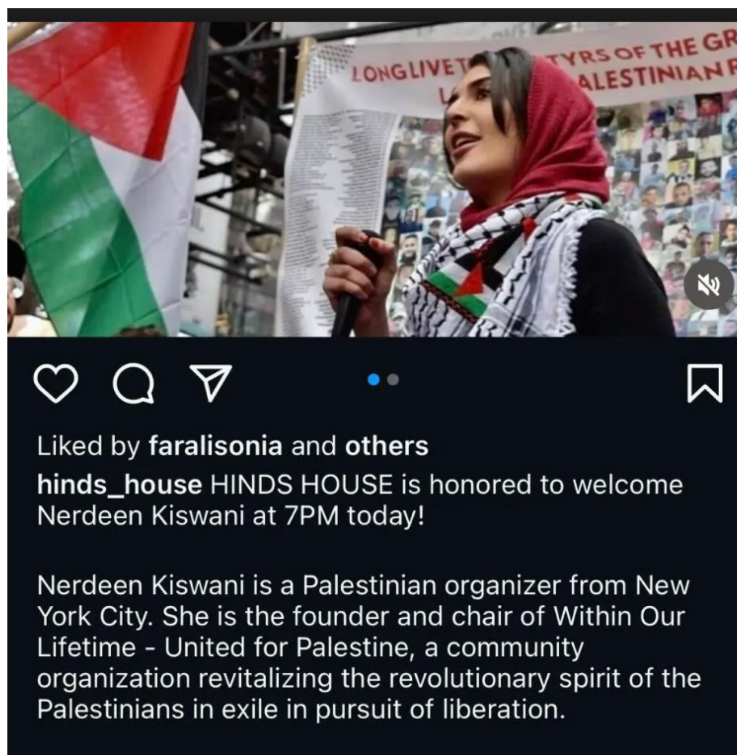
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134 Jackson Walker, *Columbia student group rescinds apology for Zionists don’t deserve to live’ comment* (last updated October 10, 2024), <https://abc3340.com/news/nation-world/columbia-student-group-backtracks-apology-for-zionists-dont-deserve-to-live-comment-university-apartheid-divest-cuad-new-york-city-nyc-khymani-james>; see also Columbia University Apartheid Divest (@cuapartheiddivest), INSTAGRAM (OCT. 8, 2024), [https://www.instagram.com/p/DA3oKFGOs1m/?img\\_index=1](https://www.instagram.com/p/DA3oKFGOs1m/?img_index=1).



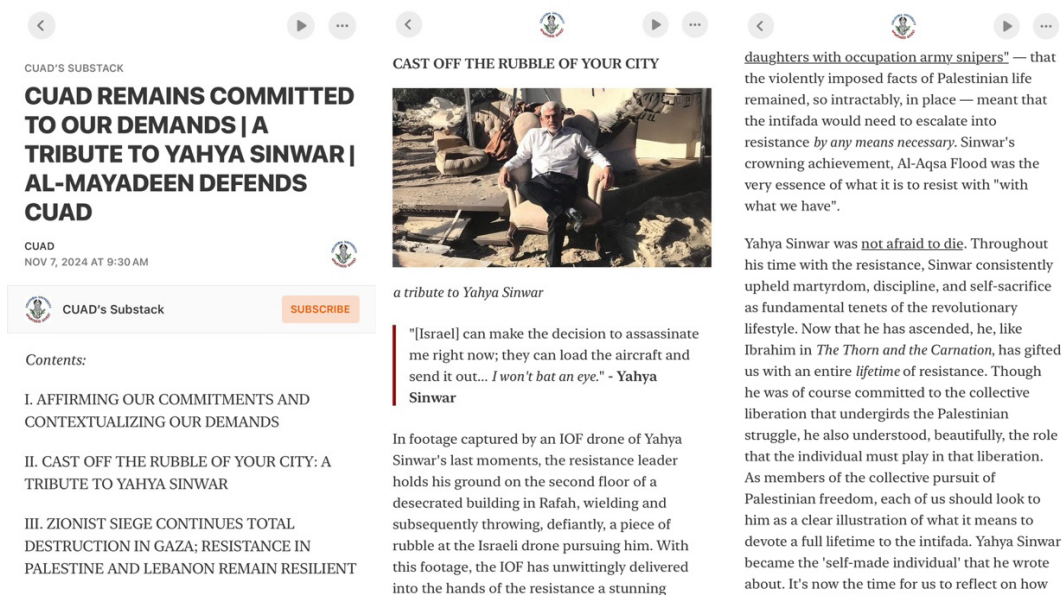
153. On November 9, 2024, CUAD and Within Our Lifetime held an exhibition at the Alpha Delta Phi (ADP) Society House titled Hind's House, in commemoration of the April 2024 Hamilton Hall takeover. Hind's House was heavily promoted on Instagram by CUAD and Within Our Lifetime. Flyers at the Hind's House exhibition listed a series of student organizations to "join and follow." These groups included CUAD, Columbia SJP, and Columbia JVP. Within Our Lifetime-branded merchandise was sold at Hind's House. Additional flyers present at the exhibition included the same Hamas propaganda distributed during the Study-In4Palestine.

154. Kiswani was a featured speaker at the Hind's House exhibition. Part of Kiswani's speech was a performance of Yahya Sinwar's last will and testament.<sup>135</sup> Yahya Sinwar was the former Chairman of Hamas' Political Bureau who was killed in battle by the IDF in October 2024.



<sup>135</sup> Maya Sulkin, *Inside Columbia University's 'Museum of Terror'*, THE FREE PRESS, (Jan. 6, 2025), <https://www.thefp.com/p/columbia-university-anti-israel-museum-of-terror>.

155. On November 27, 2024, CUAD published “A Tribute to Yahya Sinwar.” CUAD lionized Sinwar as upholding the “fundamental tenets of the revolutionary lifestyle” and called upon “each” of CUAD’s members to “look to him as a clear illustration of what it means to devote a full lifetime to the intifada.”



156. In January 2025, CUAD posted a video and a series of photos on Instagram depicting Columbia University property defaced with the following graffiti: “Gaza,” “Press your ears to the ground,” “The whole world fights for justice,” “Gaza rises, Columbia falls,” “Long Live Hind,” and “Fuck Columbia.” In the caption, CUAD wrote:

WE FIGHT UNTIL WE WIN. UNTIL PALESTINE IS FREE. CLASS IS BACK IN SESSION. GOOD LUCK COLUMBIA UNIVERSITY. ✨ ✨ ✨ WALKOUT AND RALLY TODAY AT 1PM. THERE ARE NO UNIVERSITIES LEFT IN GAZA. 400,000+ PALESTINIANS MARTYRED. CEASEFIRE IS NOT ENOUGH. LAND BACK, NOTHING LESS THAN LIBERATION.<sup>136</sup>

157. CUAD further directed its members to “bring the war home.”

<sup>136</sup> Columbia University Apartheid Divest (@cuapartheiddivest), INSTAGRAM (Jan. 21, 2025), [https://www.instagram.com/cuapartheiddivest/p/DFGJ9oZJ3Gz/?hl=en&img\\_index=](https://www.instagram.com/cuapartheiddivest/p/DFGJ9oZJ3Gz/?hl=en&img_index=).



158. More than 15 months after October 7, and with the backdrop of the most expansive war against Israel and the Jewish people since the Holocaust, CUAD has become one of the loudest and most prolific disseminators of Hamas propaganda on college campuses in 2025.

159. On Friday, January 17, 2025, Hamas posted to Telegram a calling to “free peoples around the world to continue activities in support of our people, denouncing these massacres and Zionist terrorism, and pressuring the occupation by all means to stop its aggression against our people in Gaza, Al-Quds and the West Bank.”<sup>137</sup>

160. Four days later, CUAD stormed into a class on the “History of Modern Israel” with the express intent on preventing the course from proceeding. CUAD—masked to hide their identities—screamed “Burn Zionism to the Ground!” and “Crush Zionism!” all for the express

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<sup>137</sup> Ex. 3.

purpose of preventing a course from being taught at Columbia that might espouse a perspective antithetical to the pro-Hamas narrative that they enforce on Columbia's campus.<sup>138</sup>

161. In official statements on social media, CUAD took credit for organizing the disruption and celebrated it as a model for others to follow. CUAD boasted, "We disrupted a Zionist class, and you should too," encouraging more students to copy their tactic.<sup>139</sup>

162. CUAD further declared that "History of Modern Israel isn't the only Columbia class training future foot soldiers and managers of genocide. We have an even greater duty to disrupt them all. . . . Zionist classes should not exist without disruption. It is our duty to disrupt."<sup>140</sup>

163. On February 12, 2025, the Resistance News Network posted on Telegram: "We, in the Islamic Resistance Movement (Hamas), call on the masses of our people, our Arab and Islamic nations, and the free people of the world to participate in massive rallies and solidarity events in all cities and squares around the world."<sup>141</sup> The same day, CUAD posted another call to action- "all out to low steps! For political education & a rally!" "Gaza will resist" "Gaza will rebuild."

164. On February 26, 2025, CUAD and Columbia SJP incited a mob and stormed and occupied Milbank Hall on Barnard College's campus. The mob illegally occupied the building for several hours.

165. CUAD's and Columbia SJP's mob quickly turned violent when a group of masked rioters assaulted a Barnard College staff member. The staff member was hospitalized.<sup>142</sup>

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<sup>138</sup> David Propper, *Anti-Israel Protesters Disrupt Columbia University Class, Sparking Confrontation Between Students: Video*, NEW YORK POST (Jan 22, 2025), <https://nypost.com/2025/01/22/us-news/anti-israel-protesters-disrupt-columbia-university-class-sparking-confrontation-between-students-video/>.

<sup>139</sup> *Id.*

<sup>140</sup> Columbia University Apartheid Divest (@cuaparteidivest), INSTAGRAM, (Feb. 23, 2025), [https://www.instagram.com/p/DGbAlcjpCyF/?img\\_index=1](https://www.instagram.com/p/DGbAlcjpCyF/?img_index=1).

<sup>141</sup> Ex. 3.

<sup>142</sup> Michael Starr, *Barnard Staff Hospitalized by Anti-Israel Activists Invading Campus Building*, JERUSALEM POST (Feb. 27, 2025), <https://www.jpost.com/bds-threat/article-844081>



166. On March 3, 2025, the Resistance News Network Telegram channel called on its followers to “pressure the occupation, hold it accountable for its crimes against our people, and stand in solidarity with our prisoners as they face dire conditions.”<sup>143</sup> Hamas put out a similar call to action the next day.<sup>144</sup>

167. One day after that, on March 5, 2025, CUAD forwarded a post to its telegram channel from Within Our Lifetime, which stated, “All Out to Columbia Now[.]”<sup>145</sup> That telegram post instructed students to demand “justice for Dr. Hussam Abu Safiya,”<sup>146</sup> who had been arrested during a military operation for his affiliation with Hamas, and led to the storming of Barnard College’s Milstein Library discussed below.<sup>147</sup>

168. On March 5, 2025, CUAD organized a mob that stormed and occupied Barnard College’s Milstein Library.<sup>148</sup> Again, Khalil served as the primary spokesperson and negotiator for CUAD’s mob.<sup>149</sup> However, at this point, Khalil had completed his coursework.<sup>150</sup>

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<sup>143</sup> Ex. 3.

<sup>144</sup> *Id.*

<sup>145</sup> *Id.*

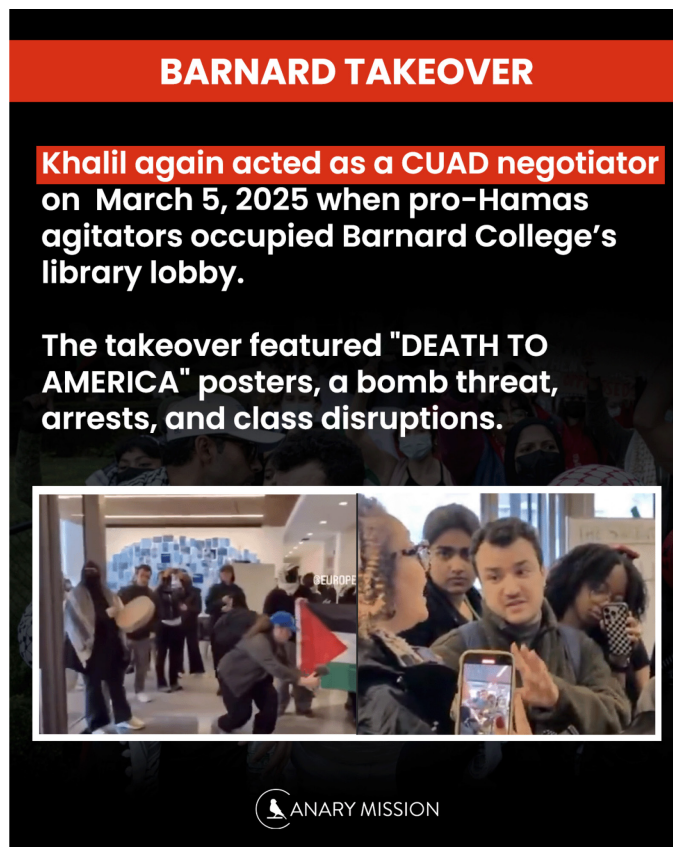
<sup>146</sup> *Id.*

<sup>147</sup> Charlie Summers, *Lawyers for Detained Gaza Hospital Chief Say He Was Abused in Israeli Custody*, TIMES OF ISRAEL (Feb. 12, 2025), [https://www.timesofisrael.com/liveblog\\_entry/lawyers-for-detained-gaza-hospital-chief-say-he-was-abused-in-israeli-custody/](https://www.timesofisrael.com/liveblog_entry/lawyers-for-detained-gaza-hospital-chief-say-he-was-abused-in-israeli-custody/).

<sup>148</sup> Riya Mahanta, Jaya Shankar, and Kimberly Wing, *CUAD Launches Sit-In at Barnard’s Milstein Library, Declares Building the “Dr. Hussam Abu Safiya Liberated Zone,”* THE BARNARD BULLETIN (March 5, 2025), <https://www.thebarnardbulletin.com/post/cuad-launches-sit-in-at-barnard-s-milstein-library-declares-building-the-dr-hussam-abu-safiya-lib>.

<sup>149</sup> Canary Mission (@canarymission), X (Mar. 13, 2025 11:19 AM), <https://x.com/canarymission/status/1900204960509227038/photo/1>.

<sup>150</sup> Nik Popli, *What to Know About Mahmoud Khalil, and Why His Green Card Was Revoked*, TIME (Mar. 12, 2025), <https://time.com/7266683/mahmoud-khalil-columbia-green-card/>.

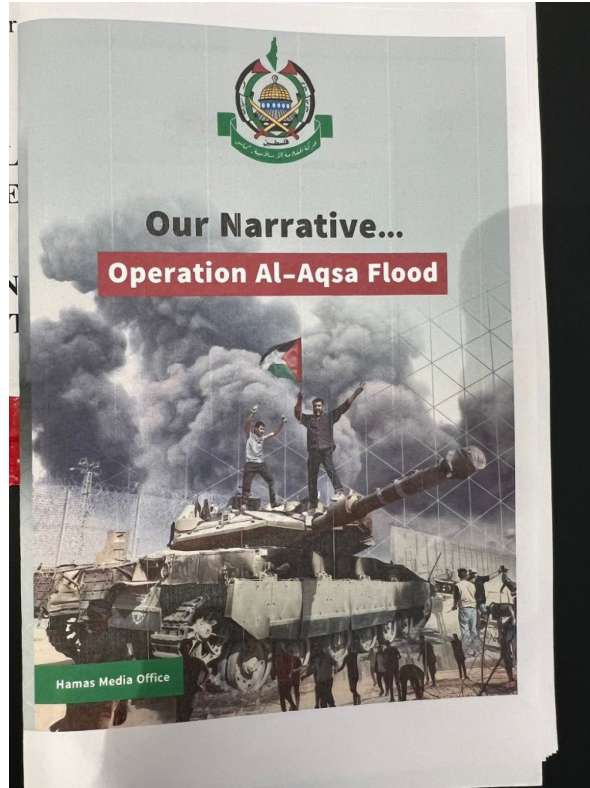


169. Khalil and the mob demanded the immediate reinstatement of the expelled students, amnesty for all individuals disciplined for pro-Palestinian activities, and the abolition of Barnard's disciplinary procedures, which they deemed unjust.

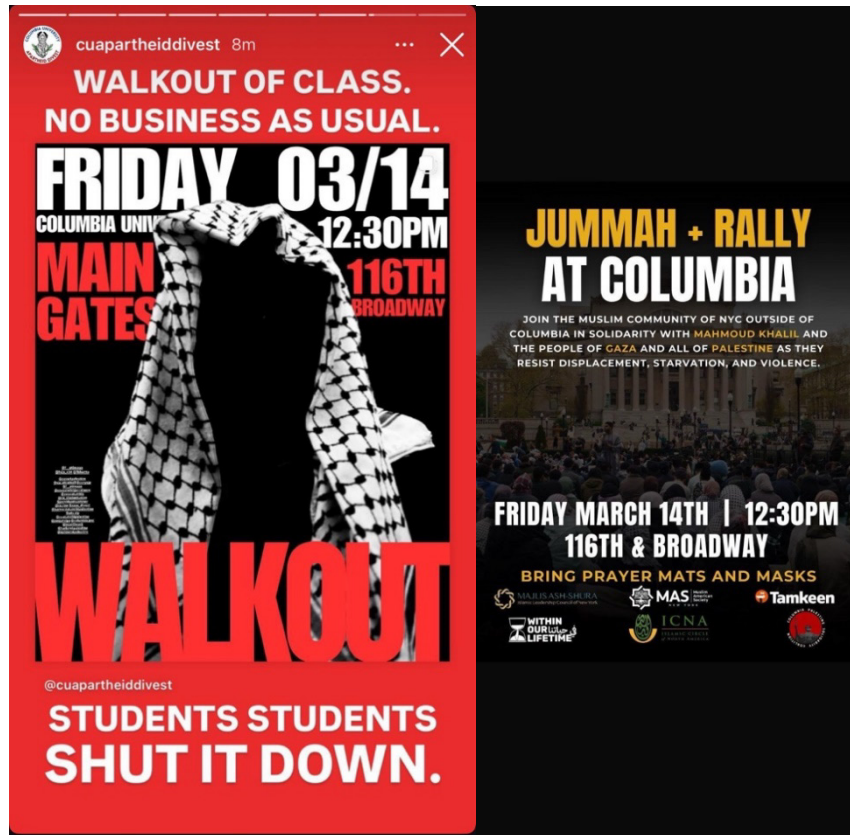
170. During the illegal occupation of Milstein Library, CUAD disseminated the “Our Narrative” pamphlet from the Hamas Media Office.<sup>151</sup>

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<sup>151</sup> Anthony Blair, *Anti-Israel Mob that Stormed Barnard Handed Out 'Hamas Media Office' Flyers Glorifying Oct. 7: 'Still Think They Don't Support Terror?'* THE NEW YORK POST (March 6, 2025), <https://nypost.com/2025/03/06/us-news/barnard-protesters-shared-hamas-media-office-flyers/>.



171. On March 9, 2025, Khalil, a Syrian native and Algerian citizen, was detained by U.S. Immigration and Customs Enforcement pending his removal from the United States. On March 14, 2025, CUAD and Within Our Lifetime organized a rally in solidarity with Khalil:



## VII. WITHIN OUR LIFETIME’S SUPPORT FOR HAMAS

### A. *Strike4Gaza*

172. The IRGC and Hamas work in tandem with each other. Iran, through the IRGC, funds and trains Hamas, and coordinates many of Hamas’ operations. Indeed, the IRGC directly enabled Hamas’ October 7 terrorist attack by funding, training, and equipping Hamas and Palestine Islamic Jihad and by assisting in the preparation and organizing of the attacks.<sup>152</sup>

173. In March 2024, the IRGC internally disseminated a secret memorandum titled “Supporting and Encouraging Palestinian Movements Towards the Political Isolation of Zionism”

<sup>152</sup> Matthew Levitt, *The Hamas-Iran Relationship*, THE WASHINGTON INSTITUTE FOR NEAR EAST POLICY (Nov. 2023), <https://www.washingtoninstitute.org/policy-analysis/hamas-iran-relationship>; Summer Said et al., *Iran Helped Plot Attack on Israel Over Several Weeks*, WALL ST. J. (Oct. 8, 2023), <https://www.wsj.com/world/middle-east/iran-israel-hamas-strike-planning-bbe07b25>.

(“IRGC Memo”).<sup>153</sup> The IRGC Memo called for “an economic blockade across four continents in solidarity with Palestinians” on April 15, 2024.<sup>154</sup>

174. The IRGC Memo leaked on April 15, 2024, the day of the planned blockade.

175. Before the leak, Hamas and the IRGC’s subordinates received their marching orders and were prepared to carry out the IRGC’s intended attack on American critical infrastructure, economic hubs, and academic centers.

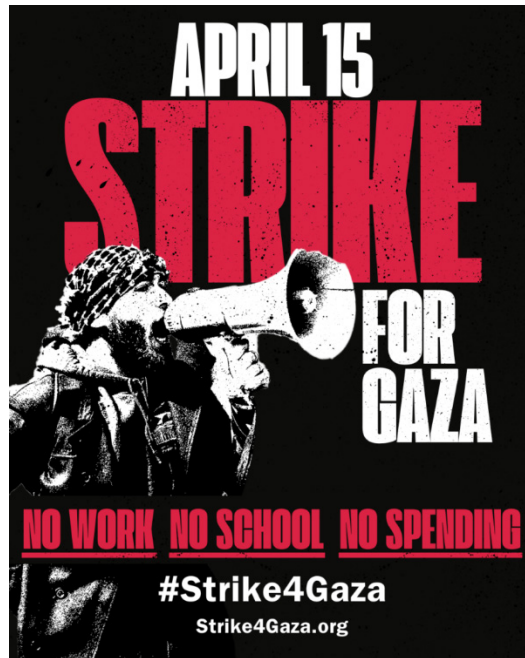
176. Beginning in March 2024, a previously non-existent organization, A15 Action, created a social media account and purchased a series of websites, including [www.a15action.com](http://www.a15action.com) (“A15 Website”) and [www.strike4gaza.org](http://www.strike4gaza.org) (“Strike4Gaza Website”). Through these channels, A15 Action coordinated an economic blockade on April 15, 2024,<sup>155</sup> directly following their orders from the IRGC. There is no real organization named “A15 Action.” It is simply a pseudonym for a group of organizations responsible for planning the April 15th Blockade. On the Strike4Gaza Website, these organizations admit that the coordinated economic blockade was “Organized By” a group of very familiar names, including AMP, NSJP, and Within Our Lifetime:

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<sup>153</sup> The IRGC Memo is attached as Exhibit 5.

<sup>154</sup> *Id.*; see also *Leaked Document Reveals IRGC’s Role in Global Anti-Israel Campaign*, IRAN INT’L NEWS (Apr. 15, 2024), <https://www.iranintl.com/en/202404158853>.

<sup>155</sup> *Coordinated Economic Blockade to Free Palestine*, A15 ACTION (Apr. 15, 2024), archived at <https://web.archive.org/web/20240327084454/https://www.a15action.com/>, <https://web.archive.org/web/20240327084454/https://www.a15action.com/>.



Organized by:



177. Within Our Lifetime was perhaps the most aggressive of these organizations. On its own webpage for the Strike4Gaza, Within Our Lifetime called for a “blockade” of the “global



economy” intended to “block[ ] the arteries of capitalism and jam[ ] the wheels of product” to support Hamas.<sup>156</sup> Within Our Lifetime specifically called on its supporters to “flood Wall Street for Gaza” to “hurt the bottom line of these war profiteers and send a message that they will not get away with committing a genocide.”<sup>157</sup> Within Our Lifetime created its own marketing materials for the Strike4Gaza:



<sup>156</sup> *April 15: Day of Action to Free Palestine*, WITHIN OUR LIFETIME (last visited Mar. 23, 2025), <https://wolpalestine.com/a15/>.

<sup>157</sup> *Id.*



178. On April 15, 2024, “Strike4Gaza” protests erupted across the world, just as the IRGC ordered. In America, Associational Defendants and the IRGC’s other allies and affiliates



across the country attacked major economic and infrastructure centers such as the Golden Gate Bridge, Brooklyn Bridge, Chicago-O’Hare Airport and—at Within Our Lifetime’s direction—the New York Stock Exchange.

179. This was planned and coordinated as part of a specific, direct response to orders from the IRGC Memo which, again, was not yet public. Within Our Lifetime engaged in the Strike4Gaza on direct orders from the IRGC Memo for the sole and specific purpose of providing knowing and substantial support to Hamas, the IRGC’s puppet.

***B. June 10, 2024, Day of Rage***

180. Within Our Lifetime planned and hosted a “Day of Rage” specifically designed to harass and disrupt and exhibit in New York honoring the murdered victims of Nova Music Festival (“Nova Exhibit”). Numerous New York-based AMP/NSJP affiliates attended Within Our Lifetime’s Day of Rage.<sup>158</sup> The Day of Rage—as one might expect—quickly descended into terroristic threats of violence, particularly against Jews. Almost immediately, Within Our Lifetime’s mob took over subway trains and began threatening people, demanding that “Zionists” identify themselves and threateningly suggested they should “get out.”<sup>159</sup>

181. Outside the Nova Exhibit, Within Our Lifetime’s rioters lit and shot flares, waved Hezbollah and Hamas Al-Qassam Brigade flags, and shouted slogans such as Long live October 7,” “Long live the intifada,” and “The Zionists are not Jews and not humans.”<sup>160</sup>

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<sup>158</sup> Adam Sabes, *Several NYC Students for Justice in Palestine groups to hold 'Citywide Day of Rage for Gaza'*, CAMPUS REFORM (June 10, 2024), <https://www.campusreform.org/article/several-nyc-students-justice-palestine-groups-hold-citywide-day-rage-gaza/25616>.

<sup>159</sup> Justin Finch & Mira Wassef, *Pro-Palestinian Protesters Take Over NYC Subway in “Day of Rage”*, NEWS NATION (June 13, 2024), <https://www.newsnationnow.com/us-news/northeast/nyc-subway-day-of-rage>.

<sup>160</sup> TOI Staff, *NYC protesters wave terror group flags, call for intifada outside Nova massacre exhibit*, TIMES OF ISRAEL (June 11, 2024), <https://www.timesofisrael.com/nyc-protesters-wave-terror-group-flags-call-for-intifada-outside-nova-massacre-exhibit/>.



*Within Our Lifetime Rioters Wave Terrorist Flags Outside the Nova Exhibit*<sup>161</sup>



*Within Our Lifetime rioters set off smoke bombs outside the Nova Exhibit*<sup>162</sup>

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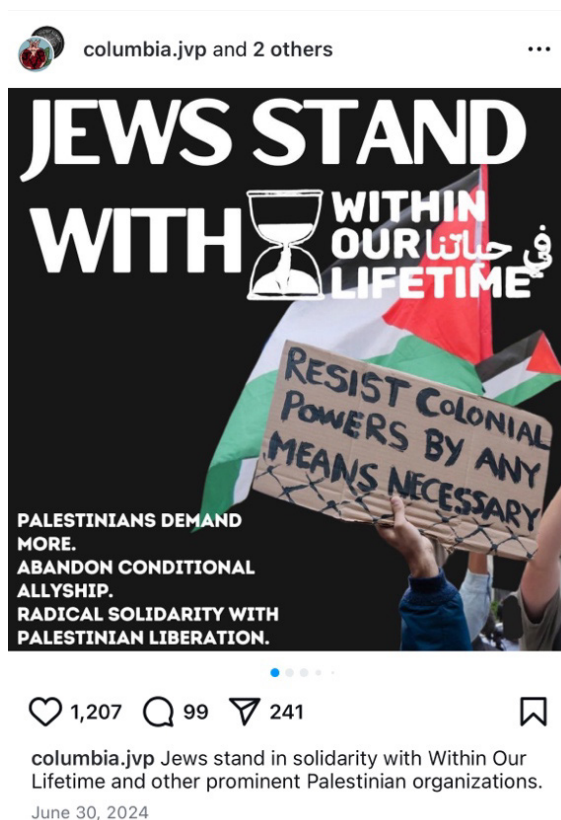
<sup>161</sup> David Propper, *Anti-Israel mob chanting 'Long live Intifada' lights flares outside NYC exhibit that memorializes Oct. 7 Nova Music Festival victims*, N.Y. POST (June 10, 2024), <https://nypost.com/2024/06/10/us-news/anti-israel-mob-chanting-long-live-intifada-light-flares-outside-nyc-exhibit-that-memorializes-oct-7-nova-music-festival-victims/>.

<sup>162</sup> *Id.*



*Within Our Lifetime Rioters Clash with Police*<sup>163</sup>

182. When Within Our Lifetime received backlash for its Day of Rage, Columbia JVP quickly came to its defense:



<sup>163</sup> *Id.*

**VIII. THE ASSOCIATIONAL DEFENDANTS' ACTIONS ARE NOT PROTECTED SPEECH**

183. This case is not about individuals and organizations independently exercising their free speech rights to support whatever cause they wish—no matter how abhorrent.

184. Rather, it is about organizations and their leaders knowingly providing substantial assistance—in the form of propaganda and recruiting services—to, and in coordination with, a designated foreign terrorist organization, Hamas. This substantial assistance is valuable to Hamas and instrumental to its ability to engage in October 7 and its subsequent and ongoing acts of international terrorism.

185. It would be illegal for Hamas to directly retain a public relations firm in the United States or hire enforcers to impose their will on American cities. Yet those are precisely the services that the Associational Defendants knowingly provide to Hamas. Indeed, in many instances, they do so in direct coordination with Hamas itself and/or with AMP/NSJP.

186. In short, Hamas relies on its propagandists around the world to do its bidding, spreading its falsehoods about Israel and the Jews far and wide, and to instigate a culture of violence and fear to sway global institutions to behave in Hamas' favor. Global propaganda, particularly directed at the West and the United States, is not just one small part of Hamas' broader strategy: *it is Hamas' grand strategy*. Sadly, Hamas' foot soldiers in New York City and on Columbia's campus have become so emboldened that they no longer feel the need to hide and are comfortable committing unlawful acts like taking over buildings.

**COUNT I**

**Violation of the Antiterrorism Act, 18 U.S.C. § 2333(d)  
(by Iris Weinstein Haggai, John Doe, Richard Roe, and Jane Moe against all Defendants)**

187. Plaintiffs Iris Weinstein Haggai, on her own behalf on behalf of Judy Lynne Weinstein and Gad Haggai, John Doe, Richard Roe, and Jane Moe (“U.S. Plaintiffs”) reallege and reincorporate all the foregoing allegations as though fully set out herein.

188. Under the ATA, “[a]ny national of the United States injured in his or her person, property, or business by reason of an act of international terrorism, or his or her estate, survivors, or heirs, may sue therefor in any appropriate district court of the United States and shall recover threefold the damages he or she sustains and the cost of the suit, including attorney’s fees.” 18 U.S.C. § 2333(a).

189. ATA “liability may be asserted as to any person who aids and abets, by knowingly providing substantial assistance, or who conspires with the person who committed such an act of international terrorism.” *Id.* § 2333(d)(2).

190. Hamas committed, planned, or authorized numerous acts of international terrorism, including:

- a. The October 7 attack;
- b. The holding of hostages in Gaza;
- c. The theft and withholding of the bodies of the deceased;
- d. Rocket attacks against civilians; and
- e. Attacks on Israeli soldiers.

191. Hamas is a United States designated FTO and was so as of the date these acts were committed.

192. U.S. Plaintiffs and their decedents have been injured in their persons, property, and/or business because of the foregoing acts of international terrorism, which are ongoing and continue through the day of this filing.

193. Associational Defendants are properly sued through their appropriate representatives.

194. Through the Associational Defendants' provision of the propaganda and recruiting services alleged above, the Associational Defendants have aided and abetted, by providing knowing and substantial assistance, the foregoing and ongoing acts of international terrorism.

195. Associational Defendants so pervasively and systemically assisted Hamas as to render them liable for every Hamas terror attack and action.

196. On information and belief, Associational Defendants' members, both explicitly and implicitly through their actions and inactions, authorized or ratified all the conduct described.

197. Accordingly, Associational Defendants are liable to U.S. Plaintiffs under the Antiterrorism Act.

**COUNT II**  
**Violation of the Law of Nations, 28 U.S.C. § 1350**  
**(by Shlomi Ziv, Ayelet Samerano, Talik Gvili, Roe Baruch, and James Poe**  
**against all Defendants)**

198. Plaintiffs Shlomi Ziv, Ayelet Samerano, on her own behalf and on behalf of Yonatan Samerano, Talik Gvili, on her own behalf and on behalf of Ran Gvili, Roe Baruch, on his own behalf and on behalf of Uriel Baruch, and James Poe, on his own behalf and on behalf of Leo Poe ("Israeli Plaintiffs"), reallege and reincorporate all the foregoing allegations as though fully set out herein.

199. The Alien Tort Statute grants federal district courts with “original jurisdiction of any civil action by an alien for a tort only, committed in violation of the law of nations or a treaty of the United States.” 28 U.S.C. § 1350.

200. Israeli Plaintiffs are Israeli citizens and are therefore aliens under the Alien Tort Statute.

201. The “law of nations,” or international law, universally prohibits acts of terrorism such as those Hamas perpetrated on and after October 7, including kidnapping and imprisoning civilian hostages, attacking civilian populations, and holding human remains to use as bargaining chips. For example, since the Nuremberg trials and the aftermath of World War II, it has been universally recognized that it is unacceptable to murder, rape, torture, imprison, deport, enslave, or exterminate a civilian population.<sup>164</sup> The Nuremberg trials also recognized that persecution based on political, racial or religious reasons violated international law.<sup>165</sup>

202. Additionally, the Rome Statute of the International Criminal Court (“Rome Statute”), an international treaty adopted in 1998 and signed by 123 countries, prohibits certain crimes against humanity that are committed against a civilian population in a systematic way, including murder, extermination, enslavement, deportation or forcible transfer of population, torture, rape, and persecution against an identifiable group.<sup>166</sup>

203. Article 34 of the Fourth Geneva Convention prohibits the taking of hostages.<sup>167</sup> Additionally, the Rome Statute states that the taking of hostages is a war crime.<sup>168</sup>

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<sup>164</sup> Nuremberg Control Council Law No. 10, art. II, § 1(b)–(d), available at <https://avalon.law.yale.edu/imt/imt10.asp>.

<sup>165</sup> *Id.* § 1(c).

<sup>166</sup> Rome Statute of the International Criminal Court art. 7 (July 17, 1998), <https://www.icc-cpi.int/sites/default/files/2024-05/Rome-Statute-eng.pdf>.

<sup>167</sup> IV Geneva Convention Relative to the Protection of Civilian Persons in Time of War art. 34 (Aug. 12, 1949), available at [https://www.un.org/en/genocideprevention/documents/atrocities-crimes/Doc.33\\_GC-IV-EN.pdf](https://www.un.org/en/genocideprevention/documents/atrocities-crimes/Doc.33_GC-IV-EN.pdf).

<sup>168</sup> Rome Statute of the International Criminal Court art. 8(2)(a)(viii) (July 17, 1998), available at <https://www.icc-cpi.int/sites/default/files/2024-05/Rome-Statute-eng.pdf>.



204. International law likewise universally prohibits the material support of terrorism. Article 2.1(b) of the International Convention for the Suppression of the Financing of Terrorism prohibits any person from “by any means, directly or indirectly, unlawfully and willfully, provid[ing] or collect[ing] funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out” any “act intended to cause death or serious bodily injury to a civilian . . . when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organization to do or to abstain from doing any act.”<sup>169</sup> Over 130 countries, including the United States, have signed this Convention.

205. “[A] defendant may be held liable under international law for aiding and abetting the violation of that law by another when the defendant (1) provides practical assistance to the principal which has a substantial effect on the perpetration of the crime, and (2) does so with the purpose of facilitating the commission of that crime.” *Presbyterian Church of Sudan v. Talisman Energy, Inc.*, 582 F.3d 244, 259 (2d Cir. 2009) (internal quotation marks omitted).

206. Associational Defendants are properly sued through their appropriate representatives.

207. Associational Defendants provide practical assistance to Hamas that has substantially affected Hamas’ ability to carry out the acts of international terrorism that have injured the Israeli Plaintiffs.

208. Both before and after October 7, Associational Defendants intentionally instigated a mass culture of fear, threats, violence, and overt hatred on Columbia’s campus to intimidate

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<sup>169</sup> International Convention for the Suppression of the Financing of Terrorism art. 2.1(b), Dec. 9, 1999, 2178 U.N.T.S. 197, available at [https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg\\_no=XVIII-11&chapter=18&clang=en](https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-11&chapter=18&clang=en).

Columbia and educational institutions across the United States and bend them to Hamas' will. Associational Defendants have spent the year and a half since Hamas' October 7 attack organizing, managing, controlling, and intentionally inciting riots and acts of domestic terrorism as part of their substantial assistance to Hamas.

209. Associational Defendants have provided this practical assistance with the purpose of facilitating Hamas' acts of international terrorism.

210. Indeed, Associational Defendants have publicly identified themselves as "PART of" Hamas' "Unity Intifada" and stated their desire to "bring [Hamas'] war home."

211. By providing this practical assistance to Hamas with the purpose of facilitating Hamas' acts of international terrorism, Associational Defendants aided and abetted Hamas' acts of terrorism, before, during, and after October 7, including Hamas' efforts to demonize Israel and exploit the international community's response to the war in Gaza to sway public opinion in its favor, in violation of international law.

212. Additionally, by providing this support, Associational Defendants have materially supported Hamas, a designated foreign terrorist organization, in violation of international law.

213. On information and belief, Associational Defendants' members, both explicitly and implicitly through their actions and inactions, authorized or ratified all the conduct described.

214. As a result of Defendants' aiding, abetting, and materially supporting Hamas, Israeli Plaintiffs and their decedents suffered injuries to their persons and property.

**PRAYER FOR RELIEF**

**WHEREFORE**, the Plaintiffs demand:

- i. Judgment against Defendants, individually and as representatives of Associational Defendants, for violating the Antiterrorism Act and the law of nations;
- ii. Compensatory damages for each Plaintiff in amounts to be determined at trial;
- iii. As to U.S. Plaintiffs, treble damages as authorized by 18 U.S.C. § 2333(a);
- iv. Punitive damages in an amount sufficient to punish Defendants, individually and as representatives of Associational Defendants, and to deter similar conduct in the future;
- v. Pre- and post-judgment interest where applicable in favor of Plaintiffs;
- vi. Costs, expenses, and attorney's fees as permitted by law or equity; and
- vii. Any such further relief as this Court deems appropriate or as justice requires.

Respectfully submitted,

/s/ Scott Bornstein

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